

**THE AFFORDABLE HOUSING
STUDY COMMISSION**



FINAL REPORT 2003

The Affordable Housing Study Commission

Final Report 2003

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THE AFFORDABLE HOUSING
STUDY COMMISSION
FINAL REPORT 2003
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July 15, 2003

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The Honorable Johnnie Byrd, Speaker
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420 Capitol
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Dear Governor Bush, President King, and Speaker Byrd:

On behalf of the Affordable Housing Study Commission, I am pleased to submit our final report for 2003. This report fulfills the requirements of section 420.609, *Florida Statutes*. The report includes the Commission's recommendations to improve public policies; to stimulate community development and revitalization; and promote the production, preservation and maintenance of safe, decent and affordable housing.

This year the Commission focused on one major topic: manufactured housing and its role in the Florida affordable housing delivery system. This was a challenging task. The Commission reviewed and considered a great amount of public and private research and studies conducted over the past decade by independent and industry organizations. We also listened to testimony from industry representatives, consumer organizations, and housing and finance professionals. We came to the conclusion that significant improvements have been made in manufactured housing and it provides safe, adequate and affordable housing for many of Florida's citizens. Drawing from the title of a recent article in one of the nation's leading housing policy journals, we concluded that *they're not trailers anymore*. Yet, manufactured housing is not without its weaknesses and challenges. We believe our report gives a balanced picture of manufactured housing in the 21st century and offers recommendations for the future.

Speaking for all members of the Commission, I extend our appreciation for the opportunity to serve the residents of Florida.

Sincerely,

Kristen K. Packard, Chair

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The Commission would also like to thank the Shimberg Center for Affordable Housing and the Florida Housing Finance Corporation for their assistance and support.

Photos courtesy of:
FMHA—Florida Manufactured Housing Association



The Commission's Legislative Charge*

The commission is charged to analyze those solutions and programs which could begin to address the state's acute need for housing for the homeless; for very-low-income, low-income, and moderate-income persons; and for elderly persons. This Commission's analysis is to include, but is not limited to:

- Offering low-interest and zero-interest loans for the development or rehabilitation of housing;
- Use of publicly owned lands and buildings as affordable housing sites;
- Coordination with federal initiatives, including development of an approved housing strategy;
- Streamlining the various state, regional, and local regulations, and housing and building codes governing the housing industry;
- Stimulation of public and private cooperative housing efforts;
- Implementation or expansion of the programs authorized under state law;
- Discovery and assessment of funding sources for low-cost housing construction and rehabilitation; and
- Development of such other solutions and programs as the commission deems appropriate.

In performing its analysis, the commission is also charged to consider both homeownership and rental housing as viable options for the provision of housing and to give consideration to various types of residential construction, including but not limited to, manufactured housing.

Mission Statement

The Affordable Housing Study Commission recommends improvements to public policy to stimulate community development and revitalization and to promote the production, preservation and maintenance of decent and affordable housing for all Floridians.

* Section 420.609, *Florida Statutes*



CHAPTER 1

Introduction – The Discovery Process

In June 2002, the Affordable Housing Study Commission deliberated over a variety of topics for its 2002–2003 study agenda. The list of possible topics included: manufactured housing, housing needs of extremely low income families, rural homeownership, housing preservation, innovative technologies to reduce costs, housing accessibility and adaptability, assisted living for the elderly, and single family housing.

While all the topics under consideration involved critical policy issues in need of examination, the Commission chose manufactured housing as its sole topic for the 2002–2003 Commission year. Its principal charge was to determine what role, if any, manufactured housing should play in Florida's affordable housing delivery system. While a number of states acknowledge the role of manufactured housing in their affordable housing strategies, manufactured housing is not currently understood to be part of Florida's affordable housing framework.

For the purposes of this report, manufactured housing is defined as housing that is built in a factory to the

U.S. Department of Housing and Urban Development's pre-emptive building code and is otherwise referred to as HUD-code housing. The limitations of such a definition were debated extensively by the Commission. In the end, the Commission chose to limit its focus to manufactured housing. The Commission still faced a challenge in understanding and overcoming many of the misconceptions and myths about this housing type—some of them not without historical justification.

Manufactured housing has its roots in the largely unregulated "travel trailer" industry of the 1940s and 1950s. In fact, it was not until 1974 that the federal government stepped in and adopted a federal code for construction standards for what then came to be called mobile homes. This was the first HUD code. A major revision of the HUD code was undertaken in the 1980s and again in 1993 – with each step seeing marked overall improvement in quality, livability and longevity of the structure. Nonetheless, negative attitudes, opinions, and perceptions have dogged the industry over several generations of the American public, not to mention Florida-specific conditions and events.



Detractors of manufactured housing argue that dressing up the name of "trailers" to "manufactured housing" doesn't change the facts: trailers are trailers—an eyesore to communities, dangerous to live in due to natural and man-made disasters, a drain on local resources, a constantly





depreciating value, and an all-around bad housing choice. While lingering images of mobile home parks stripped of all but the concrete trailer pads were Hurricane Andrew's stark reminder in 1992 of nature's power, to some those images speak also of a failed building type.

Supporters of manufactured housing argue that manufactured housing has undergone significant improvements from its early "trailer" days and is the preferred housing choice of many of Florida's residents regardless of income. Likewise, manufactured housing already plays a significant role in the delivery of lower cost housing for many of Florida's residents. Approximately two million residents, or about 12.5 percent of the state's population, live in manufactured housing; and the numbers are going up. In predominantly rural areas and counties, new housing starts are dominated by manufactured housing placements.

State-sponsored research¹ on manufactured housing indicates that manufactured housing is an important source of housing for the young as well as the elderly, with 50 percent of the units housing at least one person over the age of 65. In 2000, 37 percent of manufactured housing units in the state exclusively housed occupants over the age of 65. This research also indicates that manufactured housing residents tend to be comprised of lower-income households and families—whose housing choice was based, in part, on the lower cost of manufactured housing. Recognizing that manufactured housing already plays an increasingly important role in meeting the affordable housing needs of some of Florida's most vulnerable residents, the Affordable Housing Study Commission agreed that further study of the myriad issues related to this type of housing was merited.²

There are several avenues of study that the Commission pursued as it examined manufactured housing and debated its proper role in Florida's affordable housing delivery system. The Commission looked at the changing regulatory environment for manufactured housing, both nationally and within the state. This included the pervasive questions regarding structural and safety concerns. The Commission also looked at research on taxing, assessment and depreciation issues within manufactured housing, and discussed how these issues impact the ability of manufactured housing to "grow" the affordable housing stock and create wealth for low-income families.

Recognizing that many Floridians will choose to invest in manufactured housing as their preferred housing choice, even without state subsidies or incentives, the overall goal of the Commission in this discovery process was to determine what role the state should play, if any, in encouraging the use of manufactured housing as a safe, adequate, and affordable housing alternative for Florida's residents. Once the Commission agreed that there was potentially a role for manufactured housing to play in Florida's affordable housing delivery system, the discussion focused on what is the appropriate nature and level of state assistance, who should benefit from it, and who or what should pay for it.

The full proceedings of the Commission for the 2002—2003 study year are available on the Commission's website at: www.dca.state.fl.us/fhcd/ahsc/

The following report contains the highlights of those proceedings and concludes, in Chapter 5 with the Commission's recommendations regarding manufactured housing. The closing chapter presents the Commission's 2003 – 2004 study agenda.

¹ "Hurricane Loss Reduction for Residences and Mobile Homes in Florida," International Hurricane Center, 2001. This multi-volume study was sponsored by the Florida Department of Community Affairs.

² A partial listing of the materials and resources that the Commission used is contained in Appendix Two. A full listing of resources, materials, summary minutes of meetings, and persons consulted during the 2002-2003 study year will be part of the Study Commission proceedings to be placed on the Commission's web site, www.dca.state.fl.us/fhcd/ahsc/



Definitions

There are several terms and definitions that need to be introduced at the outset. We have divided these terms into two general categories. The first set of terms deals with the varied words and phrases that are used to describe and distinguish building types and processes. Some have been used for decades and are commonly understood by the average American speaker. Others are a bit more technical and describe a very specific building type or building process. The second set of terms is technical terms that are specific to the manufactured housing discussion. The Commission found both sets of terms useful and educational in understanding the nomenclature used in discussing manufactured housing, its role in affordable housing, and its future potential.

TERMS DEALING WITH BUILDING TYPES:

Manufactured Housing

The principal term in use, and the term that will be used throughout this report, is manufactured housing.³ Manufactured homes are built entirely in a factory and meet the Federal Manufactured Home Construction and Safety Standards, commonly known as the HUD Code. The HUD Code is federal building code adopted and administered by the U.S. Department of Housing and Urban Development.

Authorized by Congress in 1974, the HUD Code first went into effect on June 15, 1976. Since then, it has undergone revisions over the years. The principal revisions occurred in 1984 and in 1993. (See Chapter Two for a discussion of the HUD code and its revisions.) Housing units built to the HUD Code must have an integral chassis and must be transported on their own axles and wheels from the factory.⁴

These federal standards regulate manufactured housing design and construction, strength and durability, transportability, fire resistance, energy efficiency and quality. The HUD Code also sets performance standards for the heating, plumbing, air-conditioning, thermal and electrical systems. The HUD Code is a preemptive code that supersedes any state or local codes, including the Florida Building Code. However, any on-site additions to a manufactured housing unit, such as garages or decks and porches must be built to local, state or regional building codes. In Florida, those additions must be built to the Florida Building Code.

Trailers

The term trailer is a much older term than manufactured housing. It came into use well before World War II and described portable dwellings that were towed behind cars or trucks. Used by vacationing families or those on trips, the units were typically small and cramped, but did have some of the features of a standard home. The principal feature of these early trailers is that they were designed to be moved from place to place. Construction went largely unregulated.

Mobile Home

This is the term used for manufactured homes produced prior to June 15, 1976, when the first HUD Code went into effect. Many people still use this term to denote a dwelling that is built then towed to the building site and set up. The term mobile home is basically interchangeable with manufactured housing.

Modular Housing

Modular housing, like manufactured housing, is built in a factory and is transported, usually in sections, to the building site. But, that is where the similarity ends. Modular housing is built to the locally applicable building code. In Florida, modular housing is built to the Florida Building Code. Modular housing does not have an integral chassis and axles. Nonetheless, since they arrive on site in sections on the back of a trailer, they are often confused with manufactured housing.

³ "Manufactured housing" is the preferred industry term. Throughout this report, we will use manufactured housing in most cases. However, we may occasionally lapse and use the term mobile home, such as when discussing mobile home parks. We consider the terms interchangeable for purposes of this report.

⁴ These HUD-code requirements for an integral chassis are being debated nationally. However, possible HUD-code revisions such as this were not considered as part of the Commission's charge.

Factory-built housing

Factory-built housing is housing that is constructed almost entirely in a factory. They are transported to the site and arrive 30 to 90 percent complete. In manufactured and modular homes, 70 to 90 percent of the work—framing, insulation, roofing, siding, doors and windows, electrical, plumbing, appliances, and interior finishes such as painting and carpeting — are completed in the protected, secure environment of the factory. A factory built house may be built to either the Florida Building Code or the HUD Code. It is a generic term that includes both manufactured housing and modular housing.

Automated Building Construction

Automated building construction describes a process. It is almost synonymous with factory-built, but broader. It denotes building construction processes that are automated and covers automated processes that produce building components such as roof trusses, lumber cutting and sizing, to more complex automated operations that produce whole manufactured units. A manufactured housing plant will often have multiple automated building processes on-going at the same time. More advanced automated operations, have Computer-Assisted Design (CAD) departments that take architectural drawings and reduce these to cutting lists and panel layouts. These are then sent via the plant network to cutting machines and fabrication tables where computer-guided lasers very precisely mark preset nailing patterns which, in turn, guide the automated nailing.

Stick-built/Site built/Conventional construction

These are the terms normally used to designate homes built using the conventional approach to home building. Here, materials are transported to the site and the house is constructed from bottom-up at the permanent location of the home. Stick-built/site built homes in Florida are always built to the Florida Building Code.

Panelized-Construction

Panelized construction denotes a construction technology that utilizes factory-built panels for whole walls, usually with sheathing installed and occasionally with windows, doors, wiring, and outside siding. The panels are constructed in a factory, transported to the site, and then assembled on a conventional foundation or slab. Panelized homes require more on-site labor than modular or manufactured homes. Panelized homes are always built to the local code. In Florida, panelized construction is built to the Florida Building Code.

Building Codes and Building Types

In Florida there are two basic building codes that apply to new residential housing units: the Florida Building Code and the pre-emptive HUD Code. The Florida Building Code applies to standard construction site-built units and to factory-built modular units. Another way of stating this is that when a house is built to the Florida Building Code in a factory, it is called a modular building or modular house. When a house is built in a factory to the HUD Code, it is manufactured housing.

OTHER TERMS FOR UNDERSTANDING MANUFACTURED HOUSING:

Real property versus personal property⁵

Real property under the Florida Statutes covers a broad range of classifications of land based upon the use of the property. The classifications include: residential, commercial and industrial, agricultural, non-agricultural acreage, historic property, leasehold interests, time-share property, and several other classes. Some of these classifications (e.g., residential) have sub-classifications. Personal property, on the other hand, is comprised of residential floating structures, non-residential floating structures, manufactured housing, household goods and other tangible personal property.

In sum, real property encompasses land and buildings. Personal property includes all other types of property other than real property such as such as equipment, shares, boats, automobiles and accounts receivable.

In Florida, manufactured housing may be classified as either real property or personal property. A manufactured housing unit is considered real property when it is affixed to land owned by the owner of the housing unit; in fact, under Florida law, it must be classified as real property. If the manufactured housing unit is placed on leased land or a lot, the unit is classified as personal property.

Chattel lending or chattel loans

Chattel lending or chattel loans are the form of lending involving personal property where the property serves as the asset to secure the loan. Automobile loans are a form of chattel lending and manufactured housing is often financed with this type of loan.

ROC – Resident Owned Community

A Resident Owned Community is a community in which the residents own the land under a common ownership arrangement. As such, a resident-owned community may act corporately in regards to the land and management of the community. Cooperatives or land trusts are resident-owned community structures.

Land-lease or land-lease community

A land-lease or a land-lease community is a housing arrangement whereby the manufactured housing owners lease the land or lot for their homes. Usually, the lease is long-term and typically assigns responsibilities and roles for both the leaser and the lessee. Some mobile home parks operate as land-lease communities.

Mobile home park (or 'trailer park')

Mobile Home Park is the most commonly used term to designate a community usually consisting solely of manufactured housing. A mobile home park may be comprised of just a few manufactured housing units or several hundreds of units for the larger parks. Under Florida Statutes, residents of mobile home parks of at least ten units are afforded certain protections. The lots in the park are typically long and narrow and may accommodate fifteen to twenty or more units per acre; thus they tend to have a density that is higher than standard detached single family dwellings at three to five dwelling units per acre. Tenancy in parks may differ. The traditional pattern is for the park to be owned and the spaces for the housing units rented or leased to the owners of the units. In other cases, the park owner owns some or all of the units and the units are rented. Once placed, the units are rarely moved. An emerging trend is for the owners of the housing units to jointly purchase the mobile home park and organize the parks as a cooperative or a community land trust.

Manufactured housing 'section'

Manufactured housing producers often measure production in sections. A section is one unit of manufactured housing with a continuous floor. A single-section manufactured home is comprised of one section; a doublewide home is comprised of two sections; and so on. Some statistics report production in terms of sections produced.

Southern states

Census Bureau data on the manufacturing sector, including manufactured housing, provides data by state and by regions of the nation. The "South" or "Southern States" referenced in this report includes: Alabama, Florida, Georgia, Kentucky, North Carolina, South Carolina, Virginia and West Virginia.

⁵ State policies and procedures dealing with real property, personal property and taxing are contained in Chapter 195, Florida Statutes. For additional information on taxing and property status, see Chapter 3, and the section on Taxing and Real Property/Personal Property Status of Manufactured Housing.

CHAPTER 2

Manufactured Housing – An Overview

Everyone agrees that manufactured housing has evolved into a much-improved housing choice since its travel trailer days. Changing housing trends, market conditions, land use, and financing and insurance options have all contributed to fluctuations in demand for manufactured housing over the years. In 1975 there were approximately 250,000 in new housing placements nationally. More recently, manufactured housing placements have ranged from a low of 175,000 units in 1991 to a high of 373,000 units in 1998. In 2001, the national total for manufactured housing placements were 192,000; in the south⁶ it was 52,000. In Florida the total manufactured housing placements for 2001 were 11,700. (See Figure 2-1, Table 2-1)

Regardless of market conditions over the past several years, manufactured housing has come to play a significant role in providing low-cost affordable housing to lower income individuals and families. In 2001, manufactured housing accounted for more than 18 percent of the growth in the nation's homeowner occupied housing stock among all income groups, and 23 percent of the homeowner growth among households with incomes below 50 percent of the median area income. The contribution of manufactured housing to homeownership is especially pronounced in the non-metropolitan areas throughout the nation. From 1993 to 1999, fully one-third of homeownership growth outside metropolitan areas came from manufactured housing. In the non-metro south, manufactured housing's share of the growth in homeownership among very low-income homeowners between 1993 and 1999 was 63 percent. Figures 2-2 and 2-4 display this graphically. This is also depicted on the map in Figure 2-3.

⁶ "South" is defined as the states of: Alabama, Florida, Georgia, Kentucky, North Carolina, South Carolina, Tennessee, and Virginia and West Virginia.

FIGURE 2-1
SHIPMENTS OF MANUFACTURED HOUSING UNITS, UNITED STATES 1959-2001

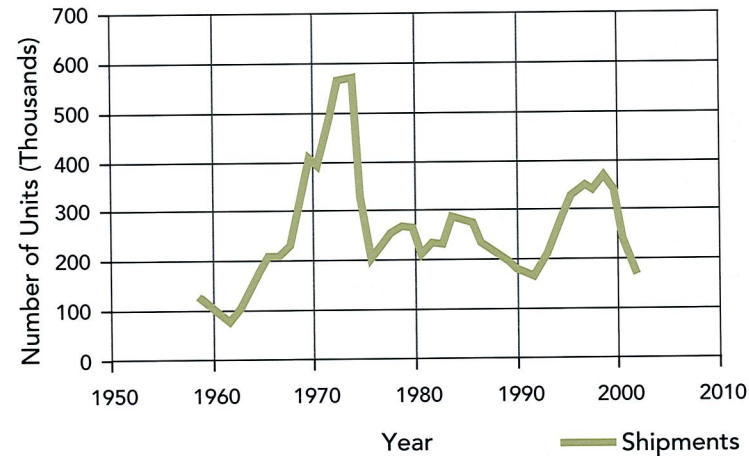


TABLE 2-1
MANUFACTURED HOUSING PLACEMENTS, 1994 – 2001

| Year | United States Total | South Atlantic Total | Florida Total | Single-Wide Florida | Double-wide Florida | Percent of total |
|------|---------------------|----------------------|---------------|---------------------|---------------------|------------------|
| 1994 | 290,900 | 91,800 | 16,800 | 7,800 | 8,800 | 52.4 |
| 1995 | 319,400 | 98,700 | 19,100 | 8,400 | 10,400 | 54.5 |
| 1996 | 337,700 | 106,400 | 20,600 | 8,200 | 12,100 | 58.7 |
| 1997 | 336,300 | 102,500 | 21,600 | 7,500 | 13,500 | 62.5 |
| 1998 | 373,700 | 115,400 | 24,100 | 7,800 | 15,800 | 65.6 |
| 1999 | 338,000 | 100,600 | 18,800 | 3,200 | 15,200 | 80.9 |
| 2000 | 280,600 | 80,200 | 13,300 | 2,000 | 11,200 | 84.2 |
| 2001 | 192,000 | 112,600 | 11,650 | 1,800 | 9,400 | 80.7 |

FIGURE 2-2 SHARE OF GROWTH OF HOMEOWNERS, 1993-1999

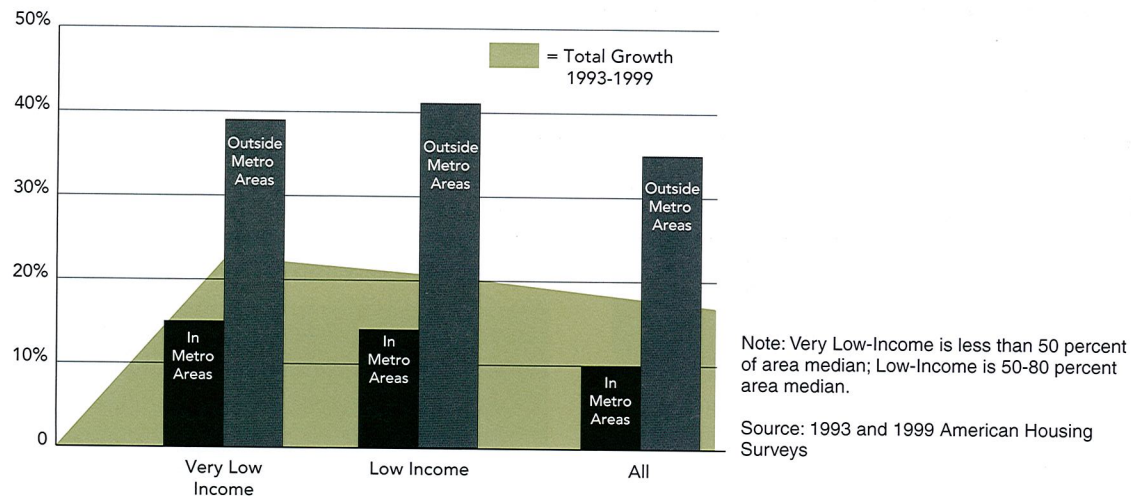
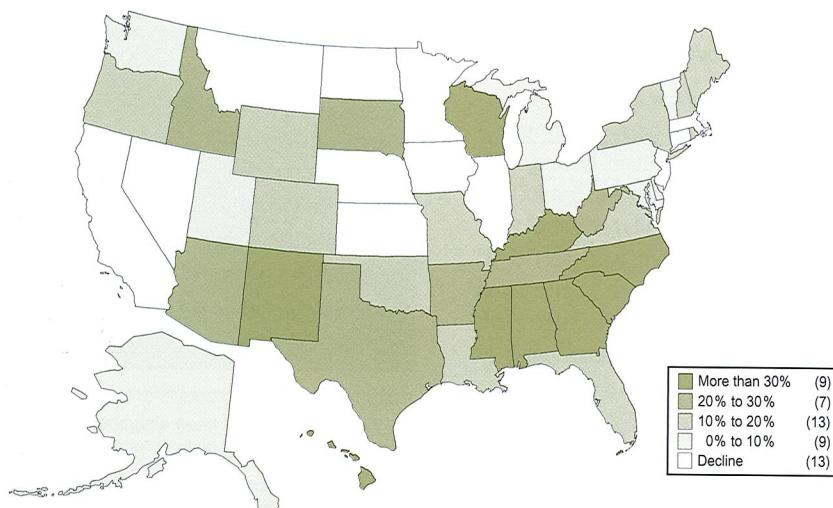


FIGURE 2-3 PERCENT CHANGE IN UNITS, 1990 – 2000



Source: United States Supplemental Survey, courtesy of Joint Center for Housing Studies, 2002.

Manufactured housing also tends to disproportionately serve particular segments of the home-buyer population. For buyers under 25 years of age and buyers over 55, manufactured housing leads all other types of units combined. Demographically, the distribution by race and ethnicity for manufactured housing mirrors that of all homeowners.⁷ (See Figures 2-5, 2-6)

QUALITY OF CONSTRUCTION AND THE HUD CODE

Question over the quality of construction is the most persistent lingering issue surrounding manufactured housing and was a very important concern for the Commission. Part of this public perception can be traced to the pre-1975 period when the only standard applying to trailers or mobile homes was a voluntary standard available for adoption by state and localities. Widespread differences in product quality and inferior manufacturing were commonplace. Part of that changed with the adoption of the initial HUD code in 1975.

The HUD Code

This code, the Manufactured Home Construction and Safety Standards or “HUD-Code,” compiled at 24 CFR Part 3280, and the companion Manufactured Home Procedural and Enforcement Regulations, compiled at 24 CFR Part 3282, are the requirements that govern the construction of manufactured homes. The code contains all the requirements and standards for construction, structural elements, fire protection, energy efficiency, plumbing, and electrical and mechanical systems. These standards preempt local and state building codes. Prior

⁷ In Florida, however, the use of manufactured housing by minorities is lower than their share of the overall population; see Chapter Three.

FIGURE 2-4 SHARE OF GROWTH IN HOMEOWNERSHIP 1993-1999
All Households vs. Very Low-Income Households in the Rural South

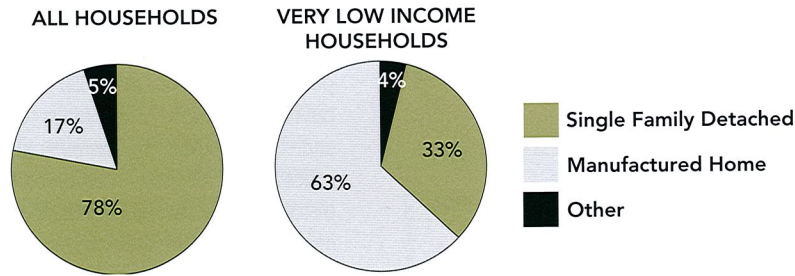
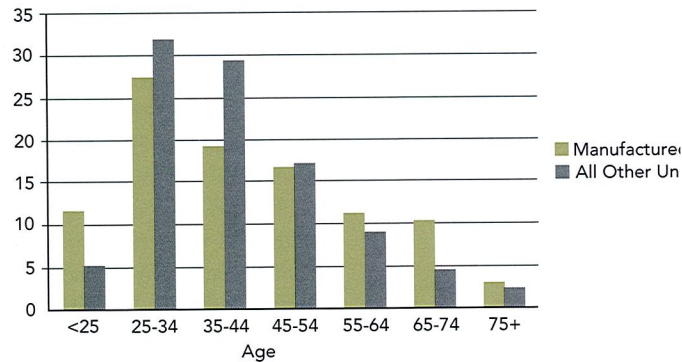
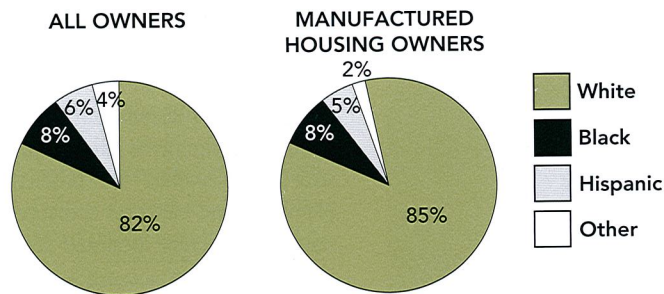


FIGURE 2-5 DISTRIBUTION OF MANUFACTURED HOUSING RESIDENTS BY AGE



Source: Courtesy of the Joint Center for Housing Studies.

FIGURE 2-6 DISTRIBUTION OF MANUFACTURED HOUSING RESIDENTS BY RACE



Source: American Housing Survey, 1999, courtesy of the Joint Center for Housing Studies.

to the adoption of the Unified Florida Building Code, the HUD code pre-empted all local building codes in the state. Now, the HUD code pre-empted the state code.

The HUD Code is a performance-based code. This makes the code different in its approach in setting standards than either the Florida Building Code or the other model building codes used nationally.⁸ This approach gives manufactured housing producers wide flexibility in construction and assembly, so long as they can demonstrate through engineering calculations or actual tests that a building component or assembly meets pre-set performance standards. In explaining this difference, the National Laboratories of the National Association of Homebuilders stated:

“For example, under the performance method a manufacturer may use any combination of materials and fasteners to construct exterior wall assemblies that withstand design dead and live loads (e.g., wind loads), and may demonstrate compliance by full-scale tests in lieu of engineering calculations. Prescriptive standards such as found in [other model building codes], on the other hand, might simply require 2x4 wall studs spaced not more than 16 inches on-center and specified amounts of structural sheathing on the first floor walls of a two-story house in a given wind zone and seismic zone. There is no testing, and therefore no opportunity to consider workmanship or the interaction of all parts of an assembly in resisting wind loads.”⁹

⁸ In the past there have been a number of model national codes used by state and local governments.

⁹ National Laboratories, NAHB, “Factory and Site-Built Housing – A Comparison for the 21st Century”

Since its initial adoption the HUD Code has undergone revision, first in the mid-1980's and again in 1994. In 1984 the Code was amended to include standards on inside air quality and formaldehyde emissions. In 1994, following the devastation of Hurricane Andrew in 1992, HUD revised the standards and established three wind zones where manufactured housing would have to meet a performance standard of withstanding winds of 100 to 110 miles per hour, the same as site-built code standards.¹⁰

Present Law and Installation

Despite these improvements in the HUD code, complaints arose over the lengthy administrative procedural steps that have acted as obstacles towards code improvement. Following testimony given before Congress in 1999, the Manufactured Housing Improvement Act was signed into law (PL No. 106-569) in December 2000. The Act mandates that HUD update the manufactured housing code in a more timely fashion and sets up a process to accomplish that task. The new law also clarifies the scope of federal preemption and provides HUD with additional staff and resources. Additionally, it requires each state to adopt an installation program and a dispute resolution program within five years of the law's enactment.

Florida is ahead of the national curve in regard to the adoption of a manufactured housing installation. Florida's mandatory installation program, administered by the Department of Highway Safety and Motor Vehicles, is recognized as a national model for states who wish to fashion their own state installation process.

Construction Quality and Code Comparisons

To more closely examine issues of construction quality, HUD funded a broad study that compared the manufactured housing industry with the site-built and modular housing industries. The goals of the research were to:

“The manufactured housing industry has evolved in the last decade to deliver a better-quality product that saves as much as 25 percent of development costs. Indeed, recent innovations in design, including multi-stories and attached garages, make manufactured housing a viable alternative for urban in-fill developments.”

—The Millennial Housing Commission,
August 2002

- Document and analyze the recent growth in industrialized housing,
- Assess technical, market and institutional factors contributing to the growth of industrialized housing, and
- Identify efficiencies that may be applicable to conventional site-built or modular housing.

The research was carried out by the National Research Center of the National Association of Home Builders.¹¹ In their general findings on comparing the HUD-code with the Council of American Building Officials (CABO) One and Two Family Dwelling Code,¹² the Research Center stated: “It is clear that there are many differences in building requirements between the HUD-Code and the CABO that contribute to differences in the cost of construction of manufactured and conventional housing. On balance, while CABO is more stringent in more areas than the

HUD Code, the net cumulative effect of the differences between the two codes is more likely on the order of hundreds of dollars rather than thousands of dollars per unit.”

The examination looked at the differences in stringency between CABO and HUD-code building-related sections related to the greatest potential effect on cost. A more stringent requirement means there is a greater likelihood that meeting the minimum criteria of the code would result in a greater cost. The following table compares the differences in stringency of selected building requirements between the HUD-code and the CABO.

The minimum standards of the HUD-code do allow lower standards than CABO and the same would hold true in comparison with the Florida Building Code; but this does not necessarily lead to the conclusion that a less safe product results, nor that the manufactured housing industry always chooses the lowest standard. Other factors are in play here. For example, while some housing customers would prefer higher ceilings or even vaulted ceilings – which many manufactured housing plants now produce – the HUD-code still allows a minimum ceiling height of seven and half feet. This is a height that many housing customers would avoid and would point to it as a typical “trailer construction feature.” Yet, the issue is not safety, it is customer preference. Likewise, under the performance standards of the HUD code, some construction features would allow seemingly less sturdy members to be used as long as performance standards are met; this does not necessarily imply that is the actual practice. The National Association of Home Builders research points out that, for example, “. . . while it is clearly possible to build manufactured homes with 2x3 exterior walls, survey data indicates it is much more common for them to have 2x4 or even 2x6 walls.”¹³ In fact, national survey data on construction details

¹¹ Op cit, NAHB

¹² The CABO for residential construction was used because it represented the most widespread building code for residential construction.

¹³ Op cit., AHB, Page 80.

indicate that it is more likely for a manufactured home to have 2x6 exterior wall studding than a site-built house. Manufactured housing producers use wider studding to increase energy efficiency by accommodating higher R-value insulation, as it is often done by site-built builders.

Other Developments: Energy

Other improvements have also contributed to improved quality and efficiency of manufactured housing that are not directly related to, nor required by, the minimum requirements of the HUD-Code. In 2002, the U.S. Environmental Protection Agency established the Manufactured Housing Energy Star program. To further the program, the Manufactured Housing Research Alliance developed guidelines for manufactured housing producers to meet the Energy Star standards. As in site-built homes, Energy Star certification is awarded to those homes that are at least 30 percent more energy efficient than a comparable home built to the CABO 1993 Model Energy Code (MEC).

Other Developments: PATH Roadmapping

Most recently, HUD has gotten into the act through its Partnerships for Advancing Technology in Housing (PATH) and its road mapping program. PATH is a public-private initiative, sponsored by HUD, dedicated to accelerating the development and use of technologies that improve the quality, durability, energy efficiency, environmental performance, and affordability of the nation's housing. Under PATH's road mapping program, key industry needs are identified. Road mapping sets the strategic research and development planning process for the PATH partnership and the industry as a whole. Road mapping has already been developed in industry sectors such as: advanced panelized construction; information technology to accelerate and streamline the home building process; energy efficiency in existing homes; and others.

In March of 2003, PATH released its technology roadmap for manufactured housing. The goals

of the manufactured housing roadmap are to continually improve the industry's core product, the manufactured single-family home, and expanding the benefits of manufactured housing to other housing types.

The Commission believes that this roadmap and the investment being made in the manufactured housing sector will result in even more industry improvements over the next several years.

Consumer Satisfaction: Blunting the Picture

While there appears to be no argument that significant strides have been made in improving the manufactured housing structure, its component systems and the performance of the units, quality problems still exist. National research by the American Association for Retired People¹⁴ (AARP) and the Foremost Insurance Group indicate a continuing concern expressed by manufactured housing residents over quality issues in their housing units. The AARP research, for example, found that seventy-seven percent of mobile home owners reported at least one problem with the construction, installation, mechanical systems or appliances of their homes. Owners of lesser expensive units¹⁵ reported more problems than those with more expensive homes. About thirty-five percent of the homeowners reported problems with the installation or with other problems resulting from faulty installation. Nonetheless, average satisfaction levels of the homeowners was 4.0 on a scale of 1 – 5, where “1” represented very dissatisfied, and “5” was very satisfied.

With the adoption of the state's installation program in 1998, inspection agency representatives report that the number of complaints stemming from faulty installation have dropped significantly.¹⁶ Even so, according to Florida industry representatives, it appears

that the majority of consumer complaints continue to be related to problems arising from faulty installation.

In summary, the Commission concluded that modern manufactured housing provides safe and adequate housing. The Commission further concluded that issues of construction quality and the standards established under the HUD code are no longer a principal area for concern, although the industry still faces challenges in improving product quality. The Commission notes that problems stemming from improper installation appear to be the single most important source leading to customer dissatisfaction.

COSTS AND AFFORDABILITY OF MANUFACTURED HOUSING

The growing popularity of manufactured housing, particularly for lower income families, is due in large part to the affordable nature of this housing choice both in terms of purchase and maintenance. In its review, the Commission wanted to determine if manufactured housing was truly more “affordable” than stick built housing and if so, under what conditions. The Commission reviewed a variety of approaches that quantified these differences.

For example, the Housing Assistance Council (HAC), a nonprofit corporation headquartered in Washington, D.C., concluded:

“In general, manufactured/mobile homes are far less expensive to purchase than conventional homes. In 1993, the median purchase price of a new conventional home in the United States was \$108,554 and that of an existing house was \$91,648. In contrast, the average purchase price, without land, of a single-wide manufactured home was \$21,900 and that of a doublewide unit was \$39,600.”¹⁷

¹⁴ *National Survey of Mobile Home Owners*, A report by the American Association of Retired People, July, 1999.

¹⁵ These were homes for which the owner paid less than \$35,000.

¹⁶ *Personal Communication*, Phil Bergelt, Department of Highway Safety and Motor Vehicles. June, 2003.

¹⁷ HAC Study reference.

It went on to state that:

“... While the cost of purchasing land would certainly add significantly to the cost of a manufactured home, a would-be homeowner is likely to be able to rent a site for a monthly cost low enough to yield total monthly payments far less than those for a conventional home.”¹⁸

The Commission also reviewed work done by the National Association of Home Builders Research Center. The Center, in research supported by the HUD, compared the industry, the construction quality, code specifications, and cost behind each building type. Table 2-2 shows the results of that cost comparison. In the final report, the Center stated:

“When comparing construction costs of the site-built home with the cost of manufactured homes, even after adjusting for size and foundation the absolute difference in these examples is over \$29,000, while the difference in construction cost between the site-built and the modular home is over \$11,000. After other cost elements and financing considerations are added and monthly loan payments are computed, a substantial difference is still apparent.”

Affordability Index

Evaluating affordability of the housing types using an affordability index is another method for quantifying differences in the affordability of manufactured housing versus site-built housing. The Commission looked at the affordability index used by the Pappas Group.¹⁹ The formula for calculating the Affordability Index is:

$$\left(\frac{\text{Annual Median Family Income}}{\text{Annual Qualifying Income}} \right) \times 100$$

TABLE 2-2
COST COMPARISONS OF “AVERAGE” HOMES

| Description: | Site-Built | Modular | | Manufactured Homes | | |
|--------------------------------|---------------------|------------------------|---------------------|--------------------|-----------------|-----------------|
| | Two-Story | Two-Story | Double-Section | Double-Section | Double-Section | Single-Section |
| Square Feet: | 1,990 | 1,990 | 1,680 | 1,680 | 1,680 | 1,215 |
| Foundation: | Blocks Private Land | Permanent Private Land | Permanent Landlease | Blocks Community | Individual Lot | Subdivision |
| Construction Costs | \$76,752 | \$65,239 | \$36,150 | \$37,650 | \$37,650 | \$21,650 |
| structure | \$70,765 | \$59,253 | \$34,650 | \$34,650 | \$34,650 | \$20,850 |
| foundation | \$5,987 | \$5,987 | \$1,500 | \$3,000 | \$3,000 | \$800 |
| cost per square foot | \$38.57 | \$32.78 | \$21.52 | \$22.41 | \$22.41 | \$17.82 |
| Land Costs | \$35,136 | \$35,136 | \$34,425 | \$34,881 | \$1,167 | \$711 |
| lot density | 4 per acre | 4 per acre | 2 per acre | 4-6 per acre | 4-6 per acre | 6-8 per acre |
| improved lot | \$33,941 | \$33,941 | \$33,714 | \$33,714 | -- | -- |
| site preparation | \$1,195 | \$1,195 | \$711 | \$1,167 | \$1,167 | \$711 |
| monthly land rent | -- | -- | -- | -- | \$250 | \$200 |
| Overhead/Administration | \$29,232 | \$27,517 | \$11,448 | \$20,179 | \$12,088 | \$7,035 |
| overhead & gen. exp. | \$8,352 | \$6,459 | \$1,908 | \$3,363 | \$2,015 | \$1,172 |
| marketing | \$3,024 | \$2,584 | \$954 | \$1,682 | \$1,007 | \$586 |
| sales commission | \$4,752 | \$4,263 | \$1,431 | \$2,522 | \$1,511 | \$879 |
| profit | \$13,104 | \$14,211 | \$7,155 | \$12,612 | \$7,555 | \$4,397 |
| Financing Costs | \$2,880 | \$1,292 | \$477 | \$841 | \$504 | \$293 |
| construction financing | \$2,880 | \$1,292 | -- | -- | -- | -- |
| inventory financing | -- | -- | \$477 | \$841 | \$504 | \$293 |
| TOTAL SALES PRICE | \$144,000 | \$129,187 | \$82,500 | \$93,551 | \$51,409 | \$29,689 |

Source: National Laboratories, National Association of Home Builders, 1999

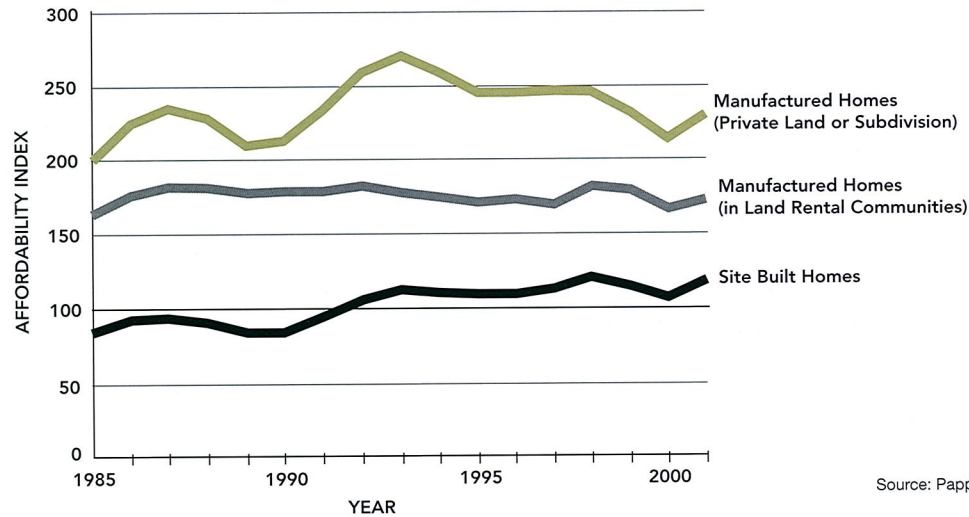
Very simply, an Index value of 100 indicates that the family making the median income can afford to buy the new, median-priced home. A value less than 100 indicates less affordability. A value greater than 100 indicates more. Figure 2-7 compares the affordability of site built homes to several manufactured housing purchase configurations.

These are: manufactured home on private land or subdivision and a manufactured home in land rental community. Compared geographically, manufactured housing in the south ranks the highest. Figure 2-8 compares the affordability of site-built housing with manufactured housing on private land and manufactured housing in a land-lease

¹⁸ Op cit., NAHB, Chapter 5.

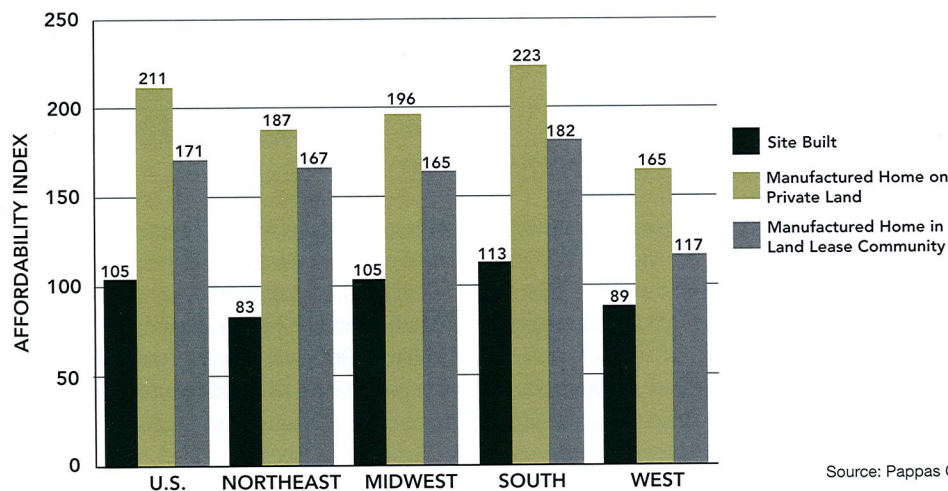
¹⁹ The assumptions underlying the Pappas Affordability Index are contained in Appendix Three.

FIGURE 2-7
AFFORDABILITY INDEX COMPARISONS 1985 – 2001



Source: Pappas Group, 2002

FIGURE 2-8
AFFORDABILITY INDEX SHOWING GEOGRAPHICAL DIFFERENCES



Source: Pappas Group, 2003

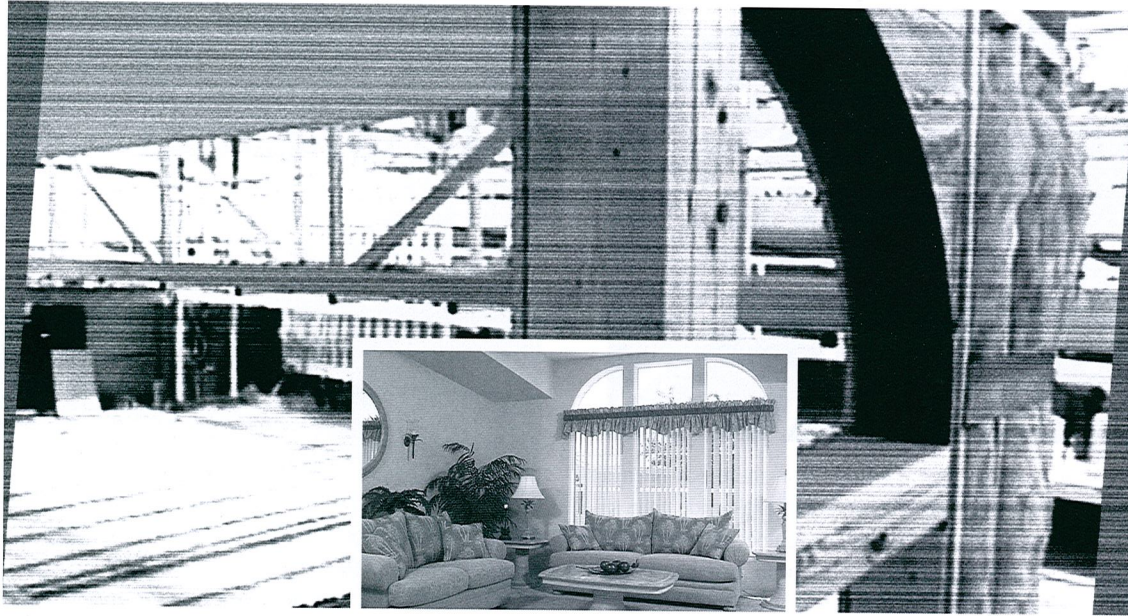
community. The Commission noted that manufactured housing sited on private land was more affordable than manufactured housing in a land-lease community.

After examining and comparing these different perspectives on comparative costs, the Commission concluded that manufactured housing provides an affordable alternative for housing Florida's families.

THE MANUFACTURED HOUSING INDUSTRY

Manufactured housing has a profoundly different structure than the conventional home construction industry. Generally speaking, the builders of site-built housing are diverse in number and size, with no single builder or small group of builders dominating the market. In contrast, in manufactured housing a handful of manufacturers account for over half of all units produced annually in the United States. The manufactured housing industry has been marked by consolidation since the 1970s. For example, in 1977 there were 306 manufacturing firms operating 597 plants. By the early 1990s, the number of firms had dropped to 155 operating 286 plants. Florida is no exception to this consolidation trend. In 1978 there were 15 companies in Florida operating 38 plants. Today, in 2003, there are seven companies in Florida that are licensed to construct manufactured housing that operate a total of 21 plants. In addition to these in-state firms, there are 21 out-of-state companies that are licensed to build manufactured housing for sale and placement in Florida. These firms are located in Alabama, Georgia and Mississippi and have a total of 32 plants. Regardless of the location of a manufactured housing plant, the same regulations apply – the HUD-Code.

The consolidation of the manufactured housing industry is as much a result of a shakeout of the smaller manufacturers and a response to the increasing number of repossessions and defaults. This has undoubtedly worked in favor of the customer. A more consolidated industry



reflects a growing efficiency in production where smaller, less-efficient producers are forced out. Fewer producers with larger plants also translate to tighter quality control in larger facilities. The lessons learned from bad financing practices, which led to repossessions, retail outlet closures and finally plant closures, has forced the industry to recognize and acknowledge the weaknesses of those practices. The result has been the adoption of financing and lending practices that will work to aid the customer.

While the manufactured housing industry has grown considerably over the past two decades, its growth has not been steady. Figure 2-1 shows the shipments of manufactured housing from 1959 through 2001. The peak year was 1973 when a total of 580,000 manufactured housing units were shipped nationally. Within two years, that number had fallen to only 211,000, reflecting the passage of the original HUD code, the subsequent retooling of production plants to meet more stringent building requirements, and

the implementation of new federal inspection programs.

Through the early 1990s, industry production remained relatively steady, producing between 200,000 to 300,000 units annually. Then, even as new energy-efficiency and wind-load standards were added to the HUD code in 1994, production began to soar. It reached a peak of 373,000 units shipped nationally in 1998 and seemed to be headed upward towards the early heyday of the 1970s where the industry produced almost 600,000 units. Again, Florida was no exception. The Florida manufactured housing industry increased its production and reached a high of 24,000 units in 1998, before the bottom dropped out of the market.

By 2001, national production of manufactured housing had fallen over 50 percent. In Florida, sales had fallen to over 55 percent from over 24,000 units to just over 11,000 units in 2001. The problems were not due to external factors, for example, national economic downturns or the imposition of new regulatory requirements—the prob-

lems were internal to the industry and industry practices. The principle advantages of the manufactured housing industry, namely its domination of the low-income family market niche, became its *Achilles' heel* as improvements in industry financing standards didn't keep pace with rapid market expansion. Some have said that the industry was a victim of its own success. In a publication on manufactured housing finance, the Federal Reserve Bank of Atlanta commented on this recent industry downturn:

*"Many factors contributed to this decline, including overproduction, poor underwriting, and significant losses in the industry... High margins of profitability lured a number of new manufacturers, retailers and lenders into the business. Manufacturers continued to increase the production to supply the new retailers, which eventually created an excess supply of these homes on the market... With keen competition for market share of this booming business, the credit underwriting policies for many of the lenders were loosened substantially, bringing in a higher risk customer base."*²⁰

By the late 1990s, the cracks began to appear as the market became saturated, retailer inventories became bloated, and most ominously, defaults began to skyrocket. With the defaults came re-possession, and the re-possession resulted in even larger inventories on the retail lots. Plants were closed and retailers boarded up their lots. The largest national financier of manufactured homes in the United States during the 1990s peak, Green Tree Financial Corporation (subsequently purchased by Conseco), had a record number of those deals end up in repossessions during 2000 and 2001. Conseco Financial Corporation, a large financial

²⁰ *Manufactured Housing Finance, Partners in Community and Economic Development*, Federal Reserve Bank of Atlanta, Volume 11, Number 3, Winter 2002.



investment company dealing in supplemental health insurance, life insurance and annuities, purchased Green Tree in 1998. Largely because of the bad debt and repossessions, Consecro went into bankruptcy in December 2002.

During the last few years the industry has worked to reestablish itself by acknowledging the errors of the past and raising its business and operating standards. Manufacturers have closed retail outlets, inventories have shrunk dramatically, and some plants have closed. Most notably, there has been an industry-wide move to higher credit underwriting and lending standards. The Manufactured Housing Institute, the industry trade association, has developed a *Lender's Best Practices Program* and is attempting to expand the role of community banks and mortgage bankers in manufactured housing finance. The Institute believes that the program will help to "...ensure that financial lenders compete in a common sense manner without the need to resort to unsound business strategies that have plagued our industry for far too many years."²¹

RECENT TRENDS AND INNOVATIONS

There have been several important developments in the manufactured housing industry that offer new direc-

tions for manufactured housing. First, there has been a significant increase in double and even triple-wide units to the point that these units now outnumber production of singlewide units. Second, there has been a change in the HUD-code that allows the removal of the trailer flange from the carriage of the individual sections. This has allowed greater design flexibility. Third, the industry has seen the introduction of hinged roof trusses allowing the use of steeper roofs. The use of steeper roofs was blocked due to the necessity to keep the height of the unit on the highway below the bridges and other vertical obstructions. With the new systems, the roof is installed at the factory and lies flat across the top of the unit, which is then transported to the site. Once on the building site, crews raise the hinged roof and secure it in place. This removes a common sign of earlier era trailers – a flat or low pitched roof – and allows the units to blend in better with site-built houses. Likewise, advanced design and the removal of design obstacles has also allowed the stacking of manufactured housing to create multi-level two and even three-story manufactured housing.

²¹ Manufactured Housing Institute, *Lender's Best Practices*, 2002.

COMMISSION FINDINGS

- Improvements in construction materials and technology, uniform standards, increased energy efficiency, and installation technology have made the current generation of manufactured housing a much-improved housing choice. This improved quality is the result of the performance-based HUD code, especially the 1994 revision, and subsequent improvements to that code.
- The Manufactured Housing Improvement Act of 2000 will promote timely revision of the HUD-Code as needed.
- An increasing number of nationally recognized and respected organizations, agencies, and institutions – not without certain qualifications – have endorsed the use of manufactured housing as an affordable housing alternative. This has included: the Millennial Housing Commission; Consumers Union; the National Research Laboratories of the National Association of Home Builders; the Joint Center on Housing at Harvard University; Neighborhood Reinvestment Corporation; the Housing Assistance Council; and the Ford Foundation.
- Due to production efficiencies involving both materials and labor, manufactured housing is less expensive than conventional site-built housing.
- Manufactured housing built to the current HUD code provides safe, adequate and affordable housing.
- Recent trends have seen a burgeoning of design styles for manufactured housing and a growing interest in the use of manufactured housing for urban infill in some parts of the country.

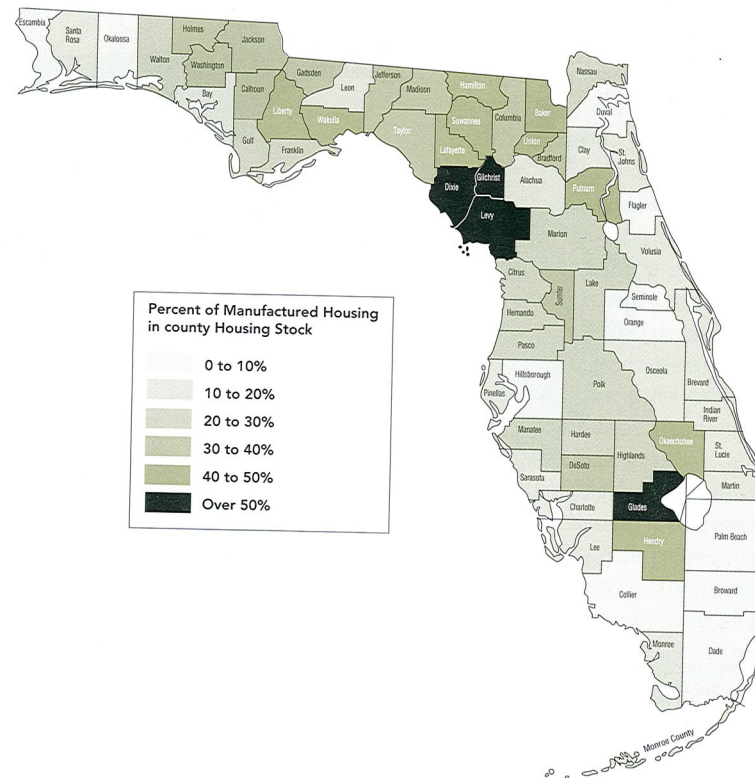
CHAPTER 3

Manufactured Housing in Florida: Understanding the Context

Given that Florida is one of the nation's most populous and fastest growing states, it comes as no surprise to learn that manufactured housing comprises a fair share of Florida's housing stock. Even so, when compared with other southern states, Florida is not a leader either in percentage of units per capita being placed each year or in percentage of manufactured housing units produced and sold. North Carolina, for example, has consistently led or been near the top in manufactured housing placements both in terms of absolute numbers and numbers per capita among the southern states, for over a decade. There are probably several reasons for this seeming disparity. Manufactured housing was a popular choice in the late 1950's through the 60's and into the early 1970's. The state's coastal counties and major urban centers acquired their large mobile home or manufactured housing stocks during that period. As the population expanded and growth sky-rocketed, coupled with the destructive impacts of severe weather systems such as hurricanes on manufactured housing, manufactured housing placement in the coastal areas was discouraged. Because this trend has continued over the past few decades with few exceptions, the major growth in manufactured housing has been in the more rural areas and counties of the state.

Understanding the dynamics of the distribution of manufactured housing in Florida was one of the first tasks with which the Commission grappled. How many are there, where are they located, when were they put there and what conclusions can we draw from this? The Commission considered this an essential foundation for any policy recommendations it might make.

FIGURE 3-1
PERCENT AND DISTRIBUTION OF MANUFACTURED HOUSING

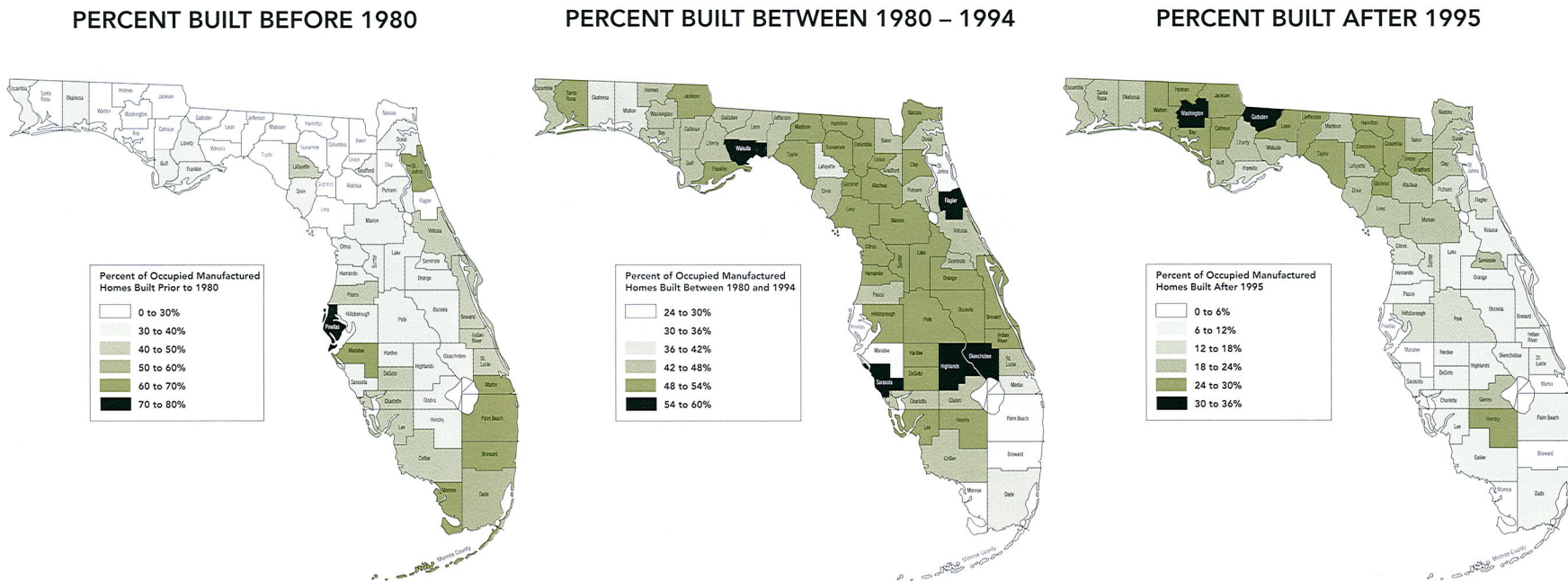


THE DISTRIBUTION AND CHARACTERISTICS OF MANUFACTURED HOUSING IN FLORIDA

Of the 7.3 million housing units in the state recorded by the 2000 Census, a total of almost 850,000 of those units are reported as manufactured housing. This means that 11.6 percent of Florida's housing stock is manufactured hous-

ing; 58 percent is single family housing, and 30 percent is multi-family housing (Figure 3.1). Of these manufactured housing units, 81.7 percent are owner-occupied and 18.3 percent are renter occupied. Compared to single-family units, the ownership rate for manufactured housing is slightly higher than single-family units and the renter rate is slightly lower than single-family units (Figure 3-2). These

FIGURE 3-2
AGE OF FLORIDA'S MANUFACTURED HOUSING STOCK



numbers indicate that approximately 9.5 percent of the state's population of 15,593,328 were living in manufactured housing at the time of the 2000 Census.

The amount of manufactured housing in each county differs markedly. The percentage of manufactured housing in each county ranges from a low of less than 2 percent in Miami-Dade County, to a high of a little over 50 percent in Levy, Dixie, Gilchrist, and Glades counties. Table 3.1 ranks counties by the percentage of manufactured housing stock. Figure 3-3 displays the ratio of manufactured housing to singles family homes by county.

The number of manufactured housing units by county

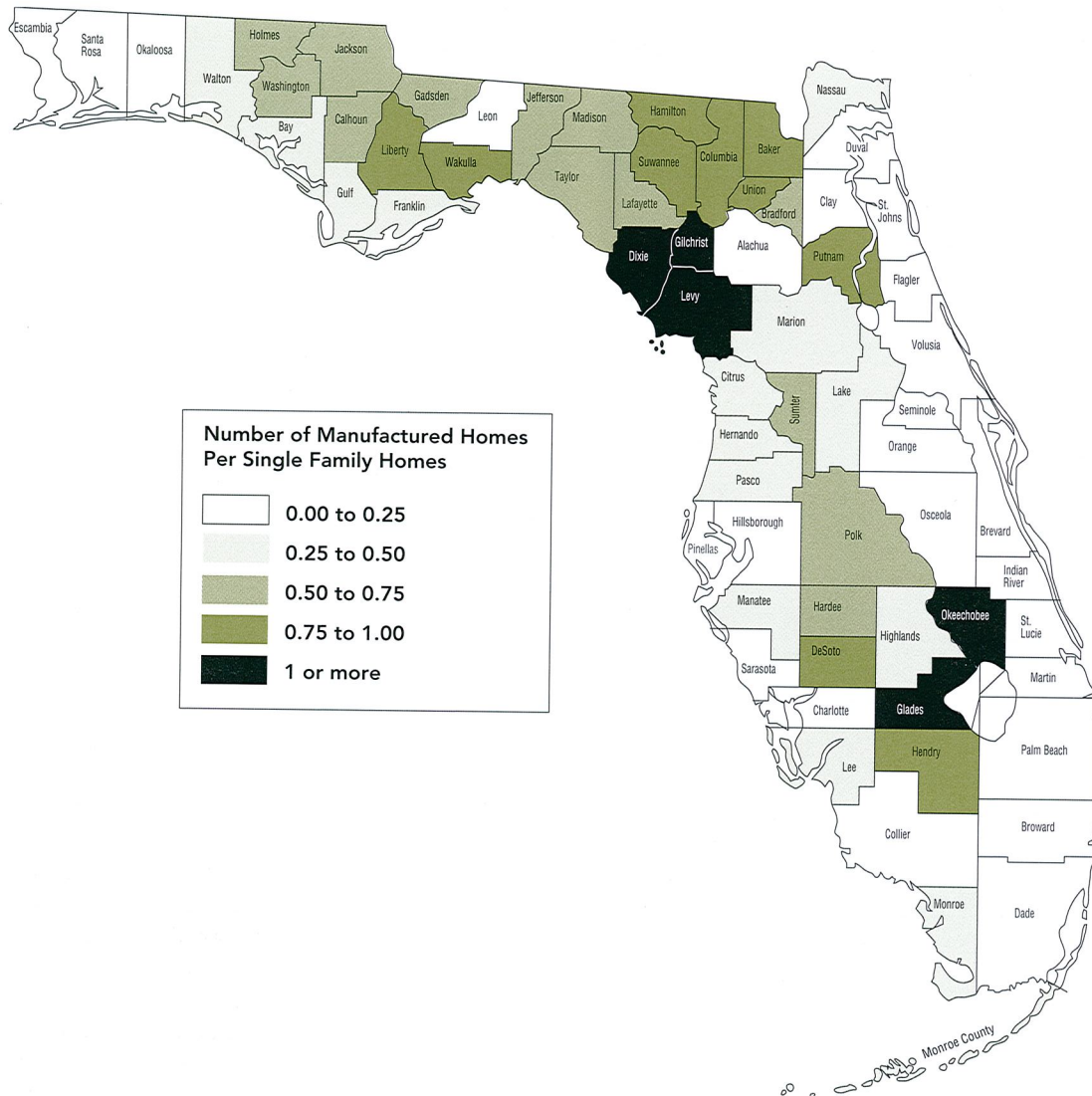
ranges from a low of a little over 1,000 units in Lafayette County to 65,000 in Polk County. Table 3.2 ranks counties by the number of manufactured housing in the county. The percent of occupied manufactured housing units by age category of the unit is depicted in the map series of Figures 3.2. This map series, combined with the number of manufactured housing units, begins to present a picture of the historical development of this housing type up to the present.

Prior to 1980, much of the manufactured housing in Florida was placed in the coastal counties from about mid-state south; or, from Volusia County on the East coast and

from Citrus and Hernando Counties on the west coast. It was during this period that these coastal counties received most of their present day manufactured housing stock (Figure 3.2, left).

Through the 1980's and up to 1995, manufactured housing placements continued all over the state, but as a percentage of overall housing stock, the emphasis shifts to the northern tier of counties (Figure 3-2, center). And, in the post-1995 period, most of the rural counties in the northern part of the state see a greatly increased housing emphasis shift to manufactured housing; while in the southern coastal counties, new manufactured housing

FIGURE 3-3
MANUFACTURED HOMES PER SINGLE FAMILY HOMES



almost disappears (Figure 3-2, right). Table 3-3 contains the distribution of manufactured housing by county for these general time periods.

In comparing Tables 3-1 – 3-3, the Commission notes that the counties with the greater number of manufactured housing tended to acquire these units prior to 1990. Today, many of these units are located in the state’s large urban population centers, specifically in parks or subdivisions where they provide affordable housing to long-term and elderly residents.

In contrast, those counties with the greatest percentage of manufactured units as part of their total housing stock tend to be the smaller, more rural counties who acquired the majority of their manufactured housing stock after 1980. County statistics indicate that a large majority of their housing starts are comprised of manufactured housing placed on homeowner-owned single lots, as opposed to the mobile home parks or subdivisions more commonly found in urban areas. This mirrors the national trend where non-metropolitan areas have much higher rates of manufactured housing than their urban area counterparts.

The Commission notes these distribution patterns and recognizes that each presents different sets of opportunities and challenges. For example, older mobile home parks predominate in the coastal counties in central and south Florida – which also are not experiencing significant increases in new manufactured housing placements. Over the past decade, the residents of some of these parks have faced a crisis as land values have risen and placed strong pressure on park owners to sell the underlying land of the park for another use. In these coastal areas, the issues of rehabilitation of aging units and mobile home park preservation are the dominant issues. In more rural areas, manufactured housing dominates the new housing market, mirroring the state trends in neighboring states. In these areas, the issues of assistance for first-time homebuyers, consumer education and consumer protection could be

TABLE 3-1
RANKINGS - PERCENTAGE OF MANUFACTURED HOUSING UNITS IN EXISTING STOCK BY COUNTY

| County | Total Units In County | ManHsg | %MH | Rank |
|------------|--------------------------|--------|------|------|
| Gilchrist | 5,906 | 3,367 | 57.0 | 1 |
| Glades | 5,790 | 3,180 | 54.9 | 2 |
| Dixie | 7,362 | 3,981 | 54.1 | 3 |
| Levy | 16,570 | 8,530 | 51.5 | 4 |
| Okeechobee | 15,504 | 7,630 | 49.2 | 5 |
| Suwannee | 15,679 | 7,460 | 47.6 | 6 |
| Union | 3,736 | 1,743 | 46.7 | 7 |
| Liberty | 3,156 | 1,469 | 46.5 | 8 |
| Baker | 7,592 | 3,438 | 45.3 | 9 |
| Hamilton | 4,966 | 2,225 | 44.8 | 10 |
| Putnam | 33,870 | 14,935 | 44.1 | 11 |
| Hendry | 12,294 | 5,316 | 43.2 | 12 |
| Wakulla | 9,820 | 4,178 | 42.5 | 13 |
| Lafayette | 2,660 | 1,072 | 40.3 | 14 |
| Columbia | 23,579 | 9,273 | 39.3 | 15 |
| Calhoun | 5,250 | 2,012 | 38.3 | 16 |
| Madison | 7,836 | 2,954 | 37.7 | 17 |
| Sumter | 25,195 | 9,495 | 37.7 | 18 |
| Washington | 9,503 | 3,539 | 37.2 | 19 |
| DeSoto | 13,608 | 5,049 | 37.1 | 20 |
| Taylor | 9,646 | 3,517 | 36.5 | 21 |
| Jefferson | 5,251 | 1,867 | 35.6 | 22 |
| Bradford | 9,605 | 3,294 | 34.3 | 23 |
| Holmes | 7,998 | 2,711 | 33.9 | 24 |
| Gadsden | 17,703 | 5,964 | 33.7 | 25 |
| Jackson | 19,490 | 6,265 | 32.1 | 26 |
| Hardee | 9,820 | 2,928 | 29.8 | 27 |
| Lake | 102,830 | 30,549 | 29.7 | 28 |
| Polk | 226,376 | 65,235 | 28.8 | 29 |
| Marion | 122,663 | 34,455 | 28.1 | 30 |
| Citrus | 62,204 | 17,212 | 27.7 | 31 |
| Highlands | 48,846 | 13,491 | 27.6 | 32 |
| Nassau | 25,917 | 6,771 | 26.1 | 33 |

TABLE 3-2
RANKINGS, TOTAL NUMBER OF MANUFACTURED HOUSING UNITS BY COUNTY

| County | Total Units in County | ManHsg | %MH | Rank |
|--------------|--------------------------|--------|------|------|
| Polk | 226,376 | 65,235 | 28.8 | 1 |
| Pinellas | 481,573 | 50,264 | 10.4 | 2 |
| Pasco | 173,717 | 43,700 | 25.2 | 3 |
| Hillsborough | 425,962 | 42,063 | 9.9 | 4 |
| Lee | 245,405 | 38,084 | 15.5 | 5 |
| Marion | 122,663 | 34,455 | 28.1 | 6 |
| Lake | 102,830 | 30,549 | 29.7 | 7 |
| Manatee | 138,128 | 27,891 | 20.2 | 8 |
| Broward | 741,043 | 26,834 | 3.6 | 9 |
| Volusia | 211,938 | 24,272 | 11.5 | 10 |
| Brevard | 222,072 | 24,092 | 10.8 | 11 |
| Duval | 329,778 | 22,485 | 6.8 | 12 |
| Sarasota | 182,467 | 20,226 | 11.1 | 13 |
| Palm Beach | 556,428 | 20,083 | 3.6 | 14 |
| Orange | 361,349 | 20,068 | 5.6 | 15 |
| Citrus | 62,204 | 17,212 | 27.7 | 16 |
| Miami-Dade | 852,278 | 15,338 | 1.8 | 17 |
| Putnam | 33,870 | 14,935 | 44.1 | 18 |
| Highlands | 48,846 | 13,491 | 27.6 | 19 |
| Hernando | 62,727 | 13,404 | 21.4 | 20 |
| Bay | 78,435 | 12,926 | 16.5 | 21 |
| Escambia | 124,647 | 11,935 | 9.6 | 22 |
| Charlotte | 79,758 | 11,611 | 14.6 | 23 |
| St. Lucie | 91,262 | 11,595 | 12.7 | 24 |
| Leon | 103,974 | 11,274 | 10.8 | 25 |
| Osceola | 72,293 | 10,989 | 15.2 | 26 |
| Alachua | 95,113 | 10,973 | 11.5 | 27 |
| Collier | 144,536 | 10,772 | 7.5 | 28 |
| Monroe | 51,617 | 9,814 | 19.0 | 29 |
| Sumter | 25,195 | 9,495 | 37.7 | 30 |
| Columbia | 23,579 | 9,273 | 39.3 | 31 |
| Clay | 53,748 | 9,231 | 17.2 | 32 |
| Santa Rosa | 49,119 | 8,586 | 17.5 | 33 |

COUNTY

TABLE 3-3
DISTRIBUTION AND AGE OF MANUFACTURED HOUSING BY COUNTY

| County | Total Units in County | ManHsg | %MH | Rank |
|--------------|-----------------------|--------|------|------|
| Levy | 16,570 | 8,530 | 51.5 | 34 |
| St. Johns | 58,008 | 7,688 | 13.3 | 35 |
| Okeechobee | 15,504 | 7,630 | 49.2 | 36 |
| Martin | 65,471 | 7,626 | 11.6 | 37 |
| Suwannee | 15,679 | 7,460 | 47.6 | 38 |
| Indian River | 57,902 | 6,786 | 11.7 | 39 |
| Nassau | 25,917 | 6,771 | 26.1 | 40 |
| Walton | 29,083 | 6,417 | 22.1 | 41 |
| Okaloosa | 78,593 | 6,385 | 8.1 | 42 |
| Jackson | 19,490 | 6,265 | 32.1 | 43 |
| Gadsden | 17,703 | 5,964 | 33.7 | 44 |
| Hendry | 12,294 | 5,316 | 43.2 | 45 |
| Seminole | 147,079 | 5,066 | 3.4 | 46 |
| DeSoto | 13,608 | 5,049 | 37.1 | 47 |
| Wakulla | 9,820 | 4,178 | 42.5 | 48 |
| Dixie | 7,362 | 3,981 | 54.1 | 49 |
| Washington | 9,503 | 3,539 | 37.2 | 50 |
| Taylor | 9,646 | 3,517 | 36.5 | 51 |
| Baker | 7,592 | 3,438 | 45.3 | 52 |
| Gilchrist | 5,906 | 3,367 | 57.0 | 53 |
| Bradford | 9,605 | 3,294 | 34.3 | 54 |
| Glades | 5,790 | 3,180 | 54.9 | 55 |
| Madison | 7,836 | 2,954 | 37.7 | 56 |
| Hardee | 9,820 | 2,928 | 29.8 | 57 |
| Holmes | 7,998 | 2,711 | 33.9 | 58 |
| Flagler | 24,452 | 2,341 | 9.6 | 59 |
| Hamilton | 4,966 | 2,225 | 44.8 | 60 |
| Calhoun | 5,250 | 2,012 | 38.3 | 61 |
| Gulf | 7,587 | 1,929 | 25.4 | 62 |
| Jefferson | 5,251 | 1,867 | 35.6 | 63 |
| Union | 3,736 | 1,743 | 46.7 | 64 |
| Liberty | 3,156 | 1,469 | 46.5 | 65 |
| Franklin | 7,180 | 1,451 | 20.2 | 66 |
| Lafayette | 2,660 | 1,072 | 40.3 | 67 |

| County | Total Units | Before 1980 | 1980-1994 | 1995+ | County | Total Units | Before 1980 | 1980-1994 | 1995+ |
|--------------|-------------|-------------|-----------|-------|-------------------------|-------------|----------------|-----------|---------------|
| Alachua | 95,113 | 2,688 | 4,662 | 2,255 | Lee | 245,405 | 11,080 | 12,179 | 1,675 |
| Baker | 7,592 | 926 | 1,485 | 714 | Leon | 103,974 | 2,485 | 4,543 | 2,603 |
| Bay | 78,435 | 2,962 | 4,612 | 2,568 | Levy | 16,570 | 1,952 | 3,407 | 1,670 |
| Bradford | 9,605 | 937 | 1,204 | 714 | Liberty | 3,156 | 327 | 465 | 190 |
| Brevard | 222,072 | 7,564 | 9,771 | 1,155 | Madison | 7,836 | 626 | 1,267 | 527 |
| Broward | 741,043 | 12,735 | 5,189 | 901 | Manatee | 138,128 | 10,914 | 6,023 | 950 |
| Calhoun | 5,250 | 455 | 742 | 486 | Marion | 122,663 | 9,117 | 13,315 | 5,032 |
| Charlotte | 79,758 | 3,636 | 3,295 | 544 | Martin | 65,471 | 3,755 | 2,273 | 182 |
| Citrus | 62,204 | 4,904 | 6,501 | 1,676 | Miami-Dade | 852,278 | 7,129 | 5,189 | 1,160 |
| Clay | 53,748 | 2,281 | 4,217 | 1,943 | Monroe | 51,617 | 4,111 | 1,990 | 312 |
| Collier | 144,536 | 3,611 | 3,473 | 601 | Nassau | 25,917 | 1,600 | 3,316 | 1,257 |
| Columbia | 23,579 | 1,877 | 3,905 | 2,319 | Okaloosa | 78,593 | 2,132 | 2,217 | 1,228 |
| DeSoto | 13,608 | 1,591 | 1,872 | 372 | Okeechobee | 15,504 | 1,926 | 3,176 | 557 |
| Dixie | 7,362 | 965 | 1,190 | 634 | Orange | 361,349 | 6,871 | 9,384 | 1,813 |
| Duval | 329,778 | 6,601 | 9,216 | 3,790 | Osceola | 72,293 | 3,031 | 4,716 | 1,040 |
| Escambia | 124,647 | 3,656 | 4,584 | 2,028 | Palm Beach | 556,428 | 9,590 | 5,082 | 1,207 |
| Flagler | 24,452 | 492 | 1,125 | 324 | Pasco | 173,717 | 13,756 | 14,316 | 3,614 |
| Franklin | 7,180 | 394 | 561 | 201 | Pinellas | 481,573 | 25,271 | 9,177 | 890 |
| Gadsden | 17,703 | 1,191 | 2,495 | 1,584 | Polk | 226,376 | 13,860 | 24,353 | 7,521 |
| Gilchrist | 5,906 | 734 | 1,376 | 718 | Putnam | 33,870 | 4,157 | 5,574 | 2,127 |
| Glades | 5,790 | 714 | 951 | 387 | Santa Rosa | 49,119 | 1,965 | 3,410 | 1,510 |
| Gulf | 7,587 | 410 | 548 | 228 | Sarasota | 182,467 | 3,362 | 4,601 | 549 |
| Hamilton | 4,966 | 377 | 988 | 523 | Seminole | 147,079 | 2,319 | 3,323 | 1,740 |
| Hardee | 9,820 | 853 | 1,150 | 269 | St. Johns | 58,008 | 8,652 | 4,813 | 443 |
| Hendry | 12,294 | 1,413 | 2,383 | 805 | St. Lucie | 91,262 | 2,117 | 2,083 | 379 |
| Hernando | 62,727 | 3,887 | 5,634 | 1,159 | Sumter | 25,195 | 2,416 | 4,004 | 996 |
| Highlands | 48,846 | 3,075 | 4,537 | 487 | Suwannee | 15,679 | 1,434 | 3,245 | 1,819 |
| Hillsborough | 425,962 | 13,600 | 17,010 | 4,468 | Taylor | 9,646 | 583 | 1,252 | 626 |
| Holmes | 7,998 | 627 | 1,098 | 574 | Union | 3,736 | 336 | 823 | 393 |
| Indian River | 57,902 | 2,060 | 2,579 | 362 | Volusia | 211,938 | 9,549 | 8,723 | 1,542 |
| Jackson | 19,490 | 1,319 | 2,553 | 1,298 | Wakulla | 9,820 | 959 | 2,004 | 712 |
| Jefferson | 5,251 | 429 | 795 | 473 | Walton | 29,083 | 1,367 | 2,027 | 1,434 |
| Lafayette | 2,660 | 349 | 325 | 188 | Washington | 9,503 | 618 | 1,246 | 898 |
| Lake | 102,830 | 9,089 | 12,271 | 2,138 | State of Florida | — | 267,769 | — | 87,482 |

considered the most dominant issues. All areas share the issues related to manufactured housing residents who are lower income and elderly, typically on fixed incomes.

MANUFACTURED HOUSING AND FLORIDA LAW

There are many provisions in Florida statutes and rules that pertain to manufactured housing or mobile homes. The principal provisions are found in Chapter 320, *Florida Statutes*,²² and Chapter 723, *Florida Statutes*. These provisions cover a broad spectrum of issues including: mobile home parks and related issues (Chapter 723, *Florida Statutes*); licensing and installation of manufactured housing, dealerships, insurance, title and fees, warranties, repossessions and other issues (Chapter 320, *Florida Statutes*).

Cities and counties may impose or otherwise regulate architectural and aesthetic design requirements for manufactured housing. However, these requirements may apply only to roofing and siding materials. They must be reasonable, uniformly applied and enforced without regard to its manufactured housing status.²³

The following highlights several of the more important issues on which the Commission received testimony.

Mobile home parks

Many manufactured housing homeowners choose to live in mobile home parks. This is particularly true of homes located in the larger urban coastal counties. The principal provisions covering mobile home parks are found in Chapter 723, *Florida Statutes*. Chapter 723 became law in 1984, and regulates the actions of both residents, and owners of manufactured home communities in Florida.²⁴ Administered and enforced by the Department of Busi-

ness and Professional Regulation, this Act addresses several issues. Among other things, the Act limits evictions and requires lengthy disclosures to residents via a prospectus document. Residents receive information regarding applicable fees and charges, the circumstances under which rent may be increased or a park may be closed, and their rights should a park owner decide to close the park. Additionally, the Act addresses false advertising and other misrepresentations, sets requirements for leases, and provides relocation expenses as noted above. Residents with a community-related complaint may file the complaint with the Florida Department of Business and Professional Regulation.

Taxing and Real Property/ Personal Property Status of Manufactured Housing

Manufactured housing in Florida is taxed in three ways, depending on the property status of the home. It may be taxed as real property, taxed through an annual license tax, or assessed and taxed as tangible personal property. If the owner of the unit permanently affixes the manufactured housing unit to land that the owner also owns, the unit is considered real property. The owner is required to purchase an "RP" series sticker from the Florida Department of Highway Safety and Motor Vehicles. Real property manufactured homes are required to be assessed by the county property appraiser, placed on the real property assessment roll and taxed annually as real property. If the owner of the unit does not own the land or lot on which the unit is located, the owner must pay an annual license tax under Chapter 320, *Florida Statutes*, and purchase an "MH" series sticker from the Department of Highway Safety and Motor Vehicles. Manufactured housing that meets the

criteria for an MH series sticker but which does not bear a current MH series sticker are presumed to be tangible personal property. These units are required to be assessed by the county property appraiser, placed on the tangible personal property assessment roll and taxed annually as tangible personal property.

Manufactured Housing Installation

For installation of manufactured housing, the Commission heard testimony that Florida is one of the nation's leaders in the installation process standards. Florida's standards have been in place since 1996. Under the Manufactured Housing Improvement Act of 2000, all states are required to have an installation process in place by the year 2004. If a state does not adopt an installation process meeting the federal minimum standards, the federal government will impose installation standards. Installations in Florida are warranted for one year.

The installation process itself is straightforward. A mobile home installer must be licensed in order to perform installations. Since a manufactured home is still considered a motor vehicle, the Department of Highway Safety and Motor Vehicles (DHSMV) issues the appropriate license. In the first step, the installer submits a foundation plan to the local building department. The DHSMV requires the installer to test the ground and perform the installation based on the load-bearing capacity of the ground. Tie-downs are installed to a wind-zone 3 and can withstand winds up to 110 miles per hour. A representative from the local building department inspects the installation to determine if the home was properly installed. A fine for up to \$500 can be levied for improper installation. Retailers are responsible for problems associated with the installation.

Consumer Protection

The Commission received testimony on the provisions under Florida law that provides consumer protections.

²² The provisions in Chapter 320, *Florida Statutes*, dealing with manufactured housing are principally administered and enforced by the Department of Motor Vehicles and Highway Safety.

²³ Section 320.8285, *Florida Statutes*.

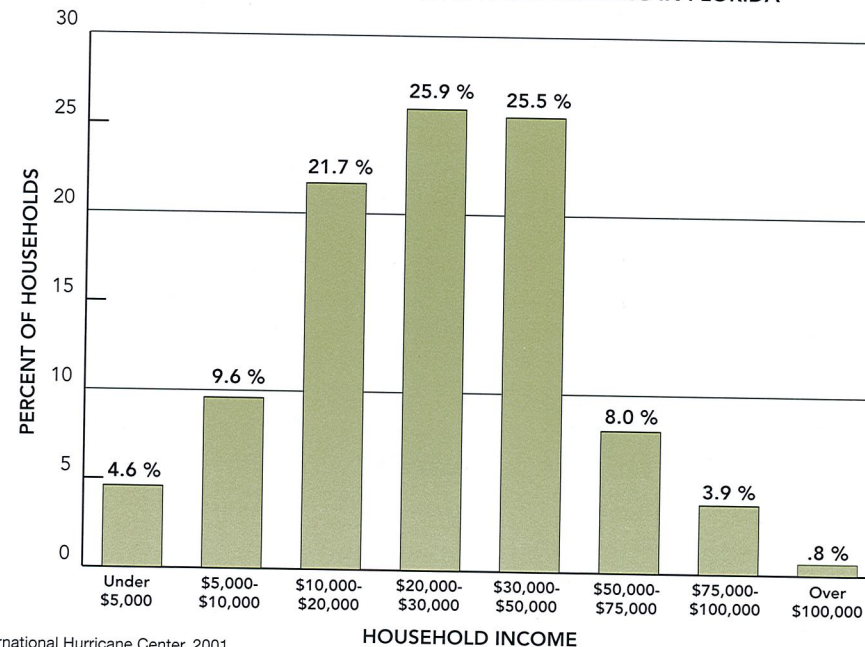
²⁴ Manufactured home community is the same as a mobile home park, though the newer communities look vastly different than older cramped mobile home parks.

Most of these provisions are in Chapter 320, *Florida Statutes*. Unlike trailers, which at one time were unregulated, Florida law now requires all manufacturers to warrant each home for at least 12 months.²⁵ This warranty covers structural elements of the dwelling in addition to the plumbing, electrical, heating and cooling, and fire protection systems. Some manufacturers now offer five-year warranties on their units.²⁶ Regardless of the length of warranty, federal regulations require that all manufacturers track all complaints from buyers for the entire life of the unit. Once a complaint is received, it must be investigated. And, if a defect is found in a home, the manufacturer must follow certain guidelines in determining the extent of the defect and, if needed, make repairs. While these federal regulations apply to all manufactured housing units produced after 1976, the Commission did not receive testimony on the extent or effectiveness of this recall-repair provision over the past several decades, especially given the fact that many manufacturers have gone out of business over the years. A fuller description of the variety of consumer protections under Florida law is contained in Appendix 4. Despite Florida's record on providing for consumer protection, the Commission notes the continuing need for consumer education regarding manufactured housing for potential homebuyers and new homeowners.

WHO LIVES IN MANUFACTURED HOUSING? THE DEMOGRAPHICS OF MANUFACTURED HOUSING IN FLORIDA

With almost 12 percent of Florida's housing units being manufactured housing, the next question the Commission explored was "Who are the residents of manufactured housing?" Asked another way, "Do the residents of manufac-

Figure 3-4
HOUSEHOLD INCOME FOR RESIDENTS OF MANUFACTURED HOUSING IN FLORIDA



Source: International Hurricane Center, 2001

tured housing share the same demographic characteristics as those who live in non-manufactured housing?"

Many interesting facts came to light during this part of the study. In regards to homeownership rates, manufactured housing residents have a slightly higher rate. Fully 86 percent of manufactured housing is owner-occupied; residents of single-family housing have an ownership rate of 81 percent.²⁷ Despite this similar or slightly higher rate for manufactured housing residents, the household incomes of manufactured housing differ markedly from the income of single-family residents.

Income

From data collected by the International Hurricane Center in a statewide survey conducted in 1999, only 12.7 percent of manufactured housing households reported incomes in excess of \$50,000. Almost 36 percent reported incomes below \$20,000, with the majority (51.4 percent) having incomes between \$20,000 and \$50,000. Figure 3-4 graphically displays this distribution of household incomes for manufactured housing.

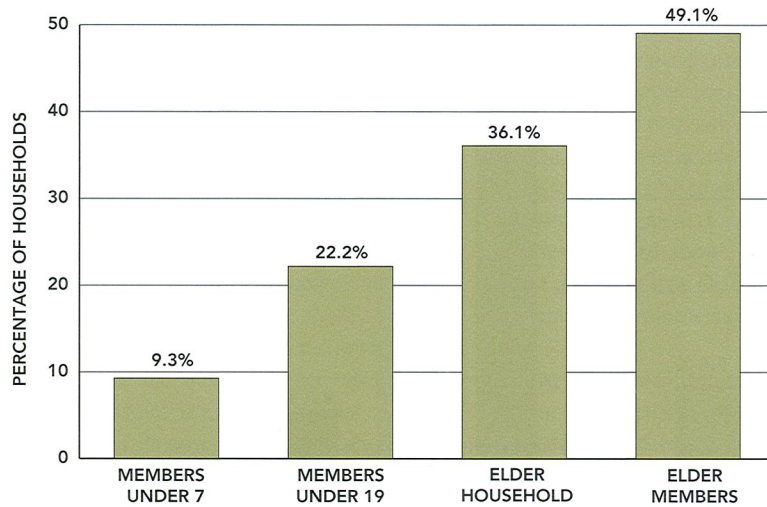
In contrast, the International Hurricane Center found that less than 10 percent of single-family homeowners and annual household incomes below \$20,000, while about 49 percent had incomes above \$50,000. This mirrors national evidence that manufactured housing households earn substantially less than families living in conventional housing.

²⁵ Section 320.835-837, *Florida Statutes*.

²⁶ Manufacturers offering five year warranties do so at no extra cost for the homebuyer.

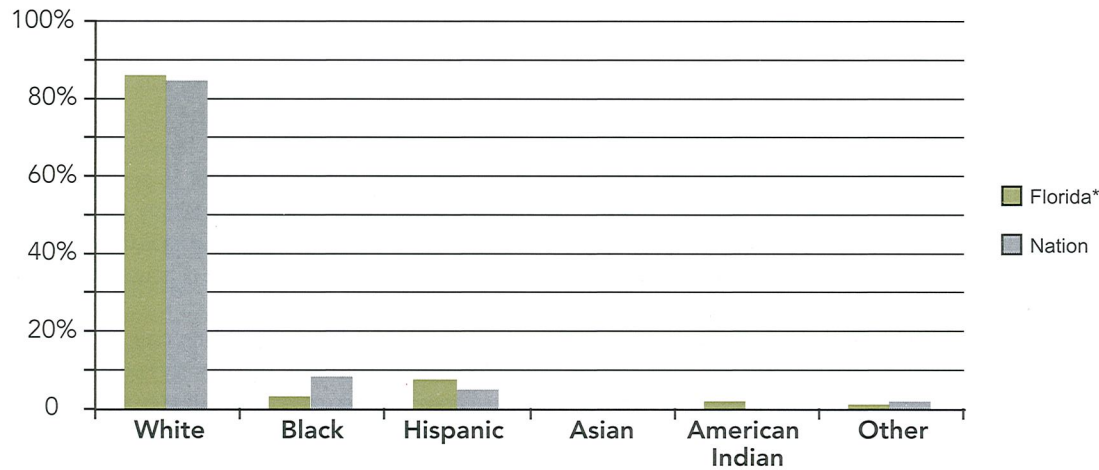
²⁷ Data from the survey conducted by the International Hurricane Center reports an ownership rate among manufactured housing residents of 90.7 percent.

FIGURE 3-5
AGE DISTRIBUTION OF MANUFACTURED HOUSING RESIDENTS



Source: International Hurricane Center, 2001

FIGURE 3-6
ETHNICITY OF MANUFACTURED HOUSING HOUSEHOLDS



* International Hurricane Center, 2001; the national numbers are from the Joint Center for Housing Studies, 2002 from American Housing Survey, 2001.

“On the whole then, households residing in mobile homes tend to be relatively small, with an average of 2.3 individuals. The vast majority of these households are identified as White or Anglo with English being the language of choice within these households. Furthermore, and perhaps most importantly, sizable percentages of these households not only contain elderly members (49%) but also, are entirely composed of elderly members (36%).”

—International Hurricane Center, 2001

Age

The age composition of the households living in manufactured housing demonstrates that 49.4 percent of all manufactured housing units in the state have at least one member who is over 65; and 37 percent have residents who are all over 65 years of age. This is shown in Table 3-5. This mirrors national statistics that show the elderly are disproportionately represented among manufactured housing residents. National studies also show that recent purchasers of manufactured housing are more likely to be below the age of 25 or over the age of 54 than purchasers of site-built housing.²⁸

Ethnicity

Ethnic preferences also play a role in determining who is likely to choose to live in manufactured housing. Accord-

²⁸ The Joint Center for Housing Studies found that recent purchasers of manufactured housing are more likely to be younger than 25 and older than 54, compared with owners of site built homes.



ing to the International Hurricane Study results, 85 percent of manufactured housing households are classified as non-Hispanic White or Anglos, with slightly more than seven percent Hispanic. Only three percent of the households are identified as non-Hispanic Blacks, compared to a general population percentage of a little less than 20 percent. This breakdown is shown in Figure 3-6. This is comparable to national statistics, which is also displayed. However, nationally, a greater number of blacks choose manufactured housing as their housing choice and the proportionate annual growth in manufactured housing among minorities is increasing.²⁹

Reasons for Choosing Manufactured Housing

Floridians express a variety of reasons for choosing to live in manufactured housing. The International Hurricane Center study found that the predominant reason, by far, is affordability. Fully half of the respondents stated that the affordability of manufactured housing was their reason for this housing choice. The closest follower to affordability as a reason was "park amenities or area amenities" at only 14 percent of the respondents. Other reasons trailed these top two and included such things as retirement, easy to get into, economical, low maintenance, and other reasons.

²⁹ These statistics and the growth of minority group share of manufactured housing are discussed by Joint Center for Housing Studies, 2002.

SUMMARY PROFILE OF MANUFACTURED HOUSING IN FLORIDA

- Households residing in mobile homes are relatively small with an average size of 2.3 individuals.
- A significant percentage (49 percent) of these households have elderly members and a sizable percentage (36 percent) is composed exclusively of individuals 65 years or older.
- Nearly 36 percent have household incomes of less than \$20,000 per year, and only 12.7 percent have incomes higher than \$50,000 per year.
- Nearly 91 percent of mobile home residents own their own homes, with approximately half of these also owning the lot or land upon which their home is located.
- Nearly 52 percent of mobile home residents are located within a mobile home park.
- Only 31 percent of these homeowners have a mortgage.
- Approximately 85 percent of homeowners have insurance.
- Just over 60 percent of mobile home residents live in doublewide or two-section mobile homes.
- Nearly 78 percent of all mobile homes have rooms, porches, or carports/garages attached to their homes.
- Slightly less than 14 percent reside in mobile homes built after 1994.
- Approximately 61 percent of mobile home owners suggest that affordability was the major reason they selected to live in a mobile home.
- On average, mobile home residents have been in their home at the current location for 9.4 years, although they have been living in mobile homes for an average of 13.7 years.



CHAPTER 4

Manufactured Housing: Opportunities and Challenges

Manufactured housing of the 21st century presents consumers with real choices. Because of its strengths, manufactured housing offers housing opportunities to citizens who might otherwise have difficulty finding adequate and affordable housing. Yet, as the Commission discovered in its proceedings, manufactured housing is not without its weaknesses and challenges. In this Chapter, the Commission explores some of those strengths, weaknesses, opportunities and challenges as it sets the appropriate context for its recommendations.

During the course of its evaluation of manufactured housing, the Commission reviewed and considered a great amount of public and private research and studies that have been conducted over the past decade by independent as well as industry organizations. This includes organizations such as the National Laboratories of the National Association of Home Builders; the Affordable Housing Research and Technology Division of the U.S. Department of Housing and Urban Development; the National Neighborhood Reinvestment Corporation; Consumer Union; the American Association of Retired People; and Harvard University's Joint Center for Housing Studies. The Commission acknowledges the positive contribution that this body of work has made in helping us better understand manufactured housing and the dynamics of the industry.

This growing body of research indicates that manufactured housing has become a better and more widely accepted housing choice in many parts of the country. Even so, the Commission recognizes that discussions over manufactured housing still generate strong reactions – both pro and con.

The Commission found it challenging at times to put aside its perceptions of “mobile homes” and “trailer parks”



to study the new reality of manufactured housing today. It was difficult at times because perceptions are often based on facts and the reality is that there are significant numbers of trailers that predate even the earliest 1976 HUD Code and enough poorly maintained parks to engender opposition to “trailer parks.”

But although perceptions often begin in reality, they often persist long after the reality has substantially changed. The Commission's findings support the evidence that clear improvements have been made in the construction of manufactured housing; the stereotype of flimsy dangerous trailers simply does not apply to the new generation of manufactured housing if they are properly installed and maintained.

Several factors can make manufactured housing a better housing choice. Some of these are discussed below.

PERSONAL PROPERTY, REAL PROPERTY AND ASSET BUILDING

When purchasing a manufactured home, one of the first issues faced by the new homeowner is whether the new home should be registered as personal property or real property. Years ago, all trailers, mobile homes, and manufactured homes were registered as personal property. While this may have certain benefits in regards to obtaining financing, the Commission reviewed a number of studies that suggest that there is a strong link between the property status of the manufactured home and the potential for the

unit to appreciate over time. This was, likewise, linked to whether or not the unit was placed on land owned by the homeowner. In 1985, approximately 40 percent of the total of manufactured housing stock was placed on land owned by the homeowner.

Since 1993, nationally almost 60 percent of manufactured housing has been placed on land owned by the owner. Housing placed on leased land has little likelihood of appreciating in value. Manufactured housing placed on owned land has a higher potential for home-price appreciation. In fact, a recent study reviewed by the Commission (Jewell, 2002) found that the difference between the appreciation of site built housing versus manufactured housing on owned land was not statistically significant. Both forms of housing outperformed manufactured housing on rented or leased land. The principal reason for this difference is that it is not units that appreciate in value, but the underlying land. The poor performance, in fact depreciation, of the manufactured homes on leased or rented land was the lack of any linkage to the value of the underlying land. Placing manufactured housing on owned land, however, is no guarantee for appreciation. If the underlying land is not likely to appreciate because of location, physical features or market conditions, placement of a manufactured housing unit on the property will do little to enhance its potential for appreciation. Likewise, consider the fact that due to the generally lower income of manufactured housing homeowners, they are also less likely to afford attractive properties. Thus, manufactured housing tends to be sited in areas where the land is less likely to appreciate at a high rate, e.g., rural areas away from urban centers and services. This is a point raised

in a recent Ford Foundation report³⁰ when it found that use of manufactured housing for asset-building would, in part, depend upon the future success of efforts to overcome local land-use controls that prevent the placement of manufactured housing in places that need affordable housing and in areas with stronger potential for appreciation.³¹

Nonetheless, the lesson to be learned here is that when asset- or wealth building is a desired outcome, the manufactured homebuyer should place the unit on owned land. In addition to the higher potential for appreciation, manufactured housing as real property in what is called a land-home deal also makes the financing more attractive for conventional lenders using standard mortgage terms. This fact has led many states to move to establish manufactured housing as real property when the homebuyer owns the underlying land. Florida again is ahead of the national curve. With full support of the manufactured housing industry, Florida law provides that when manufactured housing is sold as a land-home deal, i.e., the unit is sold with and placed permanently on the owner's land, the manufactured housing unit must be classified and registered as real property.

Despite this progressive provision under Florida law, knotty problems remain in promoting manufactured housing, particularly in rural areas where manufactured housing dominates housing starts, and wages and land values are low. Tax revenues from this mostly scattered site manufactured housing are typically low, further exacerbating the challenges local governments face in financing needed infrastructure and services and meeting constituent demands.

“ Since land is the key ingredient pushing up the value of a site-built home, it follows that unless sited on owned land, manufactured housing will have little or no potential to increase in value faster than the rate of inflation. . . for manufactured housing to realize its full potential as an affordable housing option, expanded efforts must be made to increase the share of manufactured homes placed on owned land. This combination both lowers the cost of financing a home, while still enabling owners of manufactured homes to build wealth at rates similar to owners of site built housing. ”

Excerpted from: “An Examination of Manufactured Housing as a Community- and Asset-Building Strategy,” A Report to the Ford Foundation by Neighborhood Reinvestment Corporation and the Joint Center for Housing Studies of Harvard University, 2002.

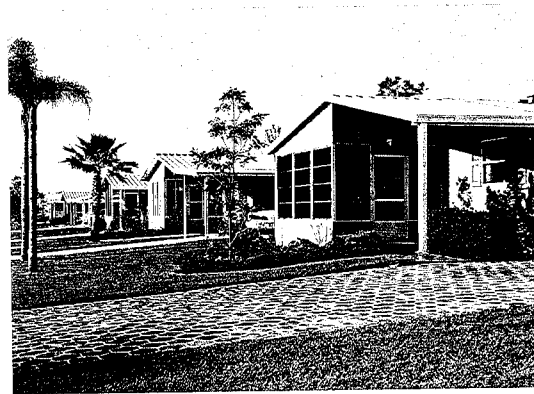
30 “An Examination of Manufactured Housing as a Community- and Asset-building Strategy,” Report to the Ford Foundation by Neighborhood Reinvestment Corporation and the Joint Center for Housing Studies, Harvard University.

31 Ibid, pg. 1

FINANCING – PRIVATE AND PUBLIC

There are two primary categories for financing manufactured housing: either as personal property or real property. Personal property loans have long been an industry standard. Personal property or chattel loans are available to borrowers with sub-par credit history, often unsecured, shorter loan terms, higher down-payment requirements, interest rates typically at least three percent to five percent higher, a quicker and less expensive process, no credit checks, appraisals or title searches required, few consumer protections and repossession if the borrower defaults. Over the last several years, the Federal Reserve has been dropping interest rates. Now, in mid-2003, conventional mortgage rates are at 40 to 45 year historic lows. Chattel rates, however, remain very high at over 12 percent for some borrowers. This unusual spread (since it is usually around 3-4 points) between the rates is a result of the increased risk due to the high number of repossessions and the slump in manufactured housing industry (see Chapter 2). For personal property loans, the principal players are finance companies and, to a lesser degree, certain government sponsored programs such as FHA Title 1, the Veteran's Administration, Freddie Mac, and Fannie Mae.

While the vast majority of financing for manufactured housing remains personal property or chattel financing, an increasing number of homeowners and financial institutions are turning to conventional mortgages for financing. A real estate mortgage for manufactured housing is comparable to loans for stick-built homes with terms and rates based on market conditions. The application and qualification process is similar to site-built homes and consumer protection regulations apply. For these types of loans, the



principal players are private lenders and mortgage companies and certain government-sponsored programs such as FHA Title 1, the Veteran's Administration and the USDA Rural Housing Services.

The Commission noted the wider range of financial institutions involved in financing manufactured housing and examined the extent to which government-based affordable housing programs and resources were being used for manufactured housing. A telephone survey was conducted by the Florida Housing Finance Corporation to determine to what extent state housing finance agencies around the nation are funding manufactured housing and for what kinds of activities. The results of the survey were revealing.

Of the twenty-three state agencies contacted, all provide funding for manufactured housing.³² The activities routinely funded include: mortgage assistance for first time homebuyers, the most popular form of assistance; down payment/closing costs for first time homebuyers; grants or loans for rehabilitation; and mortgage refinancing and

mortgage insurance. Access to funding assistance for manufactured housing is always linked with certain standards or requirements. For example, excluding Maine, all other state agencies required that manufactured housing units be placed on a permanent foundation and classified as real property.

There are a variety of revenue sources that are used to fund these assistance efforts. Tax-exempt mortgage revenue bonds, by far the most popular revenue source, are routinely used by all but two of the states. The other major sources of funding assistance include HOME, housing trust funds, Community Development Block Grants, and HFA-generated income.

How does Florida compare? Florida was conspicuous in the absence of any funding assistance for manufactured housing. In fact, the largest of the state's affordable housing programs, the flagship State Housing Initiatives Partnership (SHIP) program, contains a requirement that all SHIP-assisted units must meet the code requirements of Chapter 553, *Florida Statutes*.³³ This acts as a barrier in the use of SHIP funds for manufactured housing, since manufactured housing is produced under the pre-emptive HUD code. This prohibition on the use of SHIP funds for manufactured housing comes as no surprise. Because SHIP is funded by revenues from documentary stamp taxes arising from real property transactions, and many manufactured housing transactions are personal property transactions that do not generate the documentary stamp tax revenues to help fund the SHIP program, there is an understandable reluctance to use limited SHIP dollars to support the use of a housing option that will not generate additional funds to support the program and its mission.

However, the fact remains that since a portion of manufactured housing transactions are financed and held as real estate as opposed to personal property, a number of manufactured housing transactions do generate documentary stamp tax revenues that are deposited in the SHIP

32 The state agencies contacted and reporting included: Alabama, California, Delaware, Georgia, Kansas, Maine, Massachusetts, Michigan, New Hampshire, New Mexico, North Dakota, North Carolina, Oklahoma, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Vermont, Virginia, Washington, and Wisconsin.

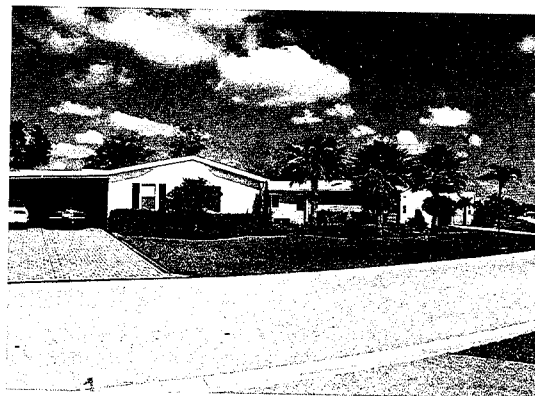
33 Chapter 553, Florida Statutes, is the Florida Building Code. Previous to the adoption of the unified Florida Building Code, local governments were given general guidance on what to adopt locally, but local codes varied considerably in standards and requirements.

program fund. The Commission attempted to ascertain what portion of the state's documentary stamp tax revenue can be attributed to the real estate sales of manufactured housing. In testimony to the Commission, the Department of Revenue stated that the manner in which documentary stamp taxes are currently collected makes it impossible to sort out manufactured housing real estate transactions from the larger pool of transactions. Special U.S. Census Bureau statistics provided to the Commission³⁴ revealed that approximately 20 percent of new manufactured housing units in 2001 were real estate rather than personal property transactions; however, these are raw numbers of units, not values of transactions, and thus it currently remains impossible to calculate the contribution of manufactured housing to the documentary stamp revenue pool.

While the Commission made an affirmative finding that SHIP funding should continue to be restricted to site-built housing only, the Commission also believes that it is important to understand how much documentary stamp tax revenue is generated by manufactured housing real property transactions. The SHIP program notwithstanding, the Commission recognizes that there are a variety of existing funding programs that could be used to support the use of manufactured housing as an affordable housing choice. The Commission believes that these existing opportunities should be explored, promoted, and perhaps expanded to assist those who are currently unable to access affordable housing.

PARK PRESERVATION

A major issue confronting manufactured housing homeowners is the conversion of an existing manufactured housing community or mobile home park to a new land use. This increases the likelihood that the land will be used differently in the future and result in the displacement of the residents. This is becoming an increasing problem around the state as older mobile home parks, some located



in areas that have become prime real estate locations, face economic pressure to close. Park closure often results in the forced relocation of residents and removes affordable housing from the local housing stock. Many of the affected residents are long-term residents with low, fixed incomes. The tension between the right of the property owner to seek the highest, best use of his property versus addressing the social and housing needs of local residents, increases pressure on local governments who seek to find a balance between these competing forces. Pinellas County has taken a proactive approach to develop policies that will balance these competing, yet legitimate, interests by creating a Task Force to study and make recommendations regarding the use of manufactured housing and the park closure issue.

Park residents are not without some protections. Conversion of a mobile home park is covered under the

provisions of Chapter 723, *Florida Statutes*. In 2000, The Florida legislature created the Florida Mobile Home Relocation Trust Fund and the Florida Mobile Home Relocation Corporation.³⁶ The purpose of the corporation is to make payments to mobile home owners who are required to move due to a change in use of the land comprising their mobile home park. These payments are designed to either purchase the home or compensate the homeowner for relocation expenses up to an amount not exceeding \$10,000 whichever is less.³⁷ While the Mobile Home Relocation Corporation and trust fund helps lessen the burden on residents forced to relocate due to park closures, the Commission recognizes that in many cases, the local housing stock may be losing affordable housing units.

As an alternative to park closure, the residents of some rental communities have preserved their community by converting the ownership of the mobile home park into a cooperative form of ownership. In this case, the park is bought from the owner and the residents own the park, with each resident owning a share in the cooperative. The Commission applauds this approach because it protects personal property rights while accomplishing the goal of maintaining affordable housing. The Commission also notes that a variety of different organizing models and funding sources could be used to promote park preservation. One such model is a community land trust, or simply a land trust.³⁸

A community land trust is a private, nonprofit corporation created to provide secure, affordable access to land

³⁴ United States Bureau of the Census collects annual data for manufactured housing, including data on the number of units that get listed as real property.

³⁵ Pinellas County was the leader in manufactured housing units at over 53,000. Polk County has surpassed Pinellas County and is now the state's leader in manufactured homes.

³⁶ These were changes to Chapter 723, *Florida Statutes*, and The Florida Mobile Home Act.

³⁷ See Subparagraph 723.0612 (1)(a)(b), *Florida Statutes*.

³⁸ The Affordable Housing Study Commission has previously looked at land trusts, though not in the context of mobile home park preservation. (See *Affordable Housing Study Commission Final Report*, 2001)

The Pinellas County Task Force on Manufactured Housing

In March of 2000, the Pinellas County Board of County Commissioners created the Mobile Home Task Force, later re-named the Manufactured Home Task Force. With one of the largest inventories of manufactured housing in the state³⁵ of 53,000+ units, and almost 200 mobile home parks, there was growing concern about the aging mobile home stock and what could be done to remove them. However, once engaged the Task Force came to recognize that manufactured home communities were a valuable contribution to the County's economy and the County's affordable housing stock. Likewise, it acknowledged the sense of neighborhood and community experienced by residents of these manufactured home communities. In working on recommendations, the Task Force set five goals it wished to accomplish. They were:

Goal 1: To provide viable financing opportunities for the economic viability of manufactured home communities

Goal 2: To utilize current programs to create new initiatives that recognize manufactured home communities as affordable housing, socially diverse, unique, stable and viable communities. To provide for housing alternatives for residents displaced by closure of manufactured home communities

Goal 3: To increase the current manufactured home community's residents rights in zoning and land use plan amendment changes by Pinellas County

Goal 4: To provide incentives to maintain viable manufactured home communities

Goal 5: To review and to provide information for our Pinellas County manufactured home communities.

and housing for community members. Land trusts are usually organized as "membership corporations," with boards of directors elected by the members. In particular, land trusts attempt to meet the needs of those least served by the prevailing market. In a land trust the corporation owns the underlying land; but the individual residents who "lease" their lot from the corporation own the dwelling units. Other ownership models include cooperatives and other forms of resident-owned communities.

The Commission recognizes that it may be cost prohibitive to some resident communities to implement such organizational and financial models absent of state assistance and support. Therefore, the Commission believes that it is appropriate for the state to undertake the development of affordable housing technical assistance tools, perhaps through the Catalyst Affordable Housing Training and Technical Assistance Program, that will help residents protect, enhance, and stabilize existing communities, while contributing to the preservation of Florida's affordable housing stock.

THE ROLE OF GOVERNMENT: LAND USE

Many local governments discourage the placement of manufactured housing within their jurisdictions. This happens for a variety of reasons including concern over property values and the need to grow the tax base, as well as community resistance and concerns arising from the old stereotypes of "trailers" and "trailer parks." Typically, the use of manufactured housing is discouraged through the creation of land development regulations and implementation of local zoning codes. Zoning districts for single-family residential units are often implicitly understood to mean single-family residential "site-built" units, and some codes do not allow manufactured housing to be placed in certain residential districts while allowing conventional site-built units to be placed. Likewise, while codes may not have

explicit prohibitions to manufactured housing, including minimum requirements such as roof pitch or other required design features can act to block the placement of manufactured housing.³⁹

A recent article in the Florida Bar Journal⁴⁰ on what city and county governments can truly regulate in regards to manufactured housing, comes to the conclusion that restricting manufactured housing or otherwise placing restrictions on manufactured housing that do not apply to conventional housing will not be upheld by the courts if challenged. The authors conclude:

"If a county or municipality in Florida wishes to adopt regulations which impact the placement and location of mobile homes or manufactured buildings, such regulations must be uniformly applied to all construction methods and be enforced without distinction as to whether the housing is manufactured, located in a mobile home park, or built in a conventional manner."⁴¹

In early 2003, the City of Jacksonville amended its land use regulations by adopting an aesthetic ordinance as part of its land development regulations. Any permissible building type, i.e., any dwellings built to either the Florida Building Code or the HUD code, could be placed in any of the residential zones in the city. This means that a manufactured housing unit could be placed anywhere in the city. However, all units must meet the minimum requirements of the aesthetics code. The Commission believes that such an approach allows a local government to avoid court challenges stemming from manufactured housing placement restrictions while maintaining community character through aesthetic requirements.



CONSUMER PROTECTION AND CONSUMER EDUCATION: CORNERSTONES FOR BUILDING THE FUTURE

The promise of manufactured housing is tempting. Quickly financed, quickly set-up and ready for move-in, the modern manufactured home can offer affordable homeownership to those who may not otherwise be able to own their own home without housing assistance. Yet, some of those very strengths bear the seeds of manufactured housing's weaknesses. High pressure sales, predatory financing or the use of high-cost personal property loans, poor installation, and wide variances in potential appreciation linked to tenureship all contribute to turning what might otherwise be a good housing choice into a bad one.⁴²

The Commission believes that none of these flaws are fatal – and all can and should be addressed through appropriate consumer education and consumer protection. The state already supports similar types of consumer education programs for conventional site-built housing through housing counseling and homebuyer education.

Therefore, the Commission concludes that the development and preparation of consumer education materials and curriculum would be appropriate state technical assistance, perhaps through the Catalyst Affordable Housing Training and Technical Assistance Program. Such curriculum will benefit residents interested in purchasing manufactured housing in helping to make that decision a good choice.⁴³ The materials should include, at a minimum, information on the advantages and disadvantages of manufactured

³⁹ The American Planning Association has recently adopted a policy statement on manufactured housing provides planners and other involved planning for local communities which could be used as a guide for revising local land development regulations to accommodate manufactured housing and ensure neighborhood fit.

⁴⁰ Florida Bar Journal article, February 2003.

⁴¹ Ibid.

⁴² A recent publication by the Consumers Union Southwest Regional Offices, "Raising the Floor, Raising the Roof," by Kevin Jewell, (May 2003) goes into more detail on the problems areas faced by consumers interested in manufactured housing and offers solutions.

⁴³ There is a growing list of organizations, both public and private, that have developed, or are developing, consumer education materials on manufactured housing. This includes: Jewell 2003, Genz, (add list)



homeownership; Florida laws and regulations pertaining to manufactured housing; consumer protections for manufactured homeowners; strategies for building equity and avoiding depreciation; unit selection; financing options; and converting land-lease community to resident ownership. Suggested guidelines for materials and an outline for a consumer education curriculum is included in Appendix 1.

AN AGENDA FOR THE FUTURE

The opportunities presented by manufactured housing are varied. The education of consumers in regards to financing issues, product maintenance, and related matters promises a bright future for manufactured housing, both in the nation and the state of Florida. The challenge remains, however, in overcoming the tarnished image of public perceptions about manufactured housing's past performance. In other words, these are local prejudices that still need to be overcome. Nonetheless, the need for affordable housing

continues unabated and manufactured housing provides an alternative to address that need.

While manufactured housing appears to be a dominant form of housing in many rural areas, there are increasing examples of the use of manufactured housing in urban settings. Part of this comes from industry innovations that have made the modern manufactured house more like its stick-built site-built counterpart. The major industry group, the Manufactured Housing Institute (MHI), sponsored the Urban Design Project that worked in urban areas around the nation to develop five pilot demonstration project using manufactured housing. There are increasing numbers of design innovations and floor plan options, some of them made possible by the move to multiple-section manufactured housing. Examples of that housing are included in this Report. In 2001, The Automated Builder's Consortium annual meetings in Pittsburgh featured a tour of an urban infill-brownfield project using manufactured housing. In 2002, the Consortium held joint meetings with the MHI in Cincinnati that featured a half-day tour of a manufactured housing urban infill project at a Cincinnati brownfield.

Financing is becoming more like standard housing, especially as states like Florida move to classify manufactured homes as real property when permanently affixed to the land. Most major financial institutions, including all the major Government Sponsored Entities (GSEs), have developed, or are developing standard mortgage packages for manufactured housing.

Consumer education and consumer protection remain important pivotal elements in this makeover of an industry and a product once thought to be inferior, dangerous to live in, and an eyesore on local communities. Yet, code improvements, improvements in manufacturing and new and varied design options, have resulted in housing that is safe, adequate, and less likely to raise eyebrows. Most important, it is affordable. It is in this spirit that the Commission drafted its recommendations on manufactured housing.



Findings and Recommendations

MANUFACTURED HOUSING: A FRAMEWORK FOR THE FUTURE

The following findings and recommendations reflect the work of the Commission over the past year.

FINDINGS

Based on the investigation and proceedings of the Commission during the 2002 - 2003 study year and as described in preceding chapters of this Report, the Commission finds:

- *Improvements in construction materials and technology, uniform standards, increased energy efficiency, and installation technology have made the current generation of manufactured housing a much-improved housing choice.*
- *Due to production efficiencies involving both materials and labor, manufactured housing is less expensive than conventional site built housing.*
- *Manufactured housing built to the current HUD code provides safe, adequate and affordable housing.*
- *Florida is a national leader in ensuring that manufactured housing meets strict installation standards and provides consumer protection through state-enforced warranties.*
- *Florida has adopted provisions for manufactured housing to be classified as real property when purchased as a land-home deal.*
- *Manufactured housing is the preferred housing choice for many Floridians.*
- *Many lower income individuals and families live in manufactured housing.*
- *In Florida, a handful of coastal counties and cities have a large majority of the older and aging manufactured housing stock. Many are located in parks or communities.*
- *Older mobile home parks are often located in areas that have become thriving real estate markets. As property values increase, it becomes more likely that these parks will close and transition to commercial or other uses, resulting in the displacement of residents and a potentially diminished affordable housing stock. ◦*

- *In recent years manufactured housing has dominated housing starts in the non-metropolitan and rural areas of the state.*
- *Manufactured housing is a viable housing alternative to conventional site-built housing.*
- *Some older manufactured housing units are in need of repair and/or remodeling to improve access for the disabled, yet there are few available resources for rehabilitation of these units.*
- *The elderly, young adults, lower-income persons and families, and the disabled are disproportionately represented among the residents of manufactured housing.*
- *While there are exceptions, manufactured housing does not appreciate in value at the rate, nor to the extent, of conventional site-built housing.*
- *Due to industry structure, some manufactured housing is financed through personal finance loans, as one would finance a car. This can lead to higher interest rates for manufactured home-buyers.*
- *Increasingly, manufactured housing buyers have the opportunity to finance their purchases through conventional lending institutions comparable to the purchase and financing options of those buying a site-built home.*
- *Save for regulatory oversight and enforcement, there is little or no direct state involvement in facilitating access to, and preserving, manufactured housing. No state-administered affordable housing program currently provides resources for manufactured housing unit purchase assistance, rehabilitation, or other housing unit activities that might otherwise be available to the owner of a standard site-built dwelling unit. However, several state-administered programs have no statutory or regulatory barriers for such use.*





Therefore, the Commission concludes the following:

- *The creation and development of a state manufactured housing assistance program to assist local governments in meeting the housing needs of their most vulnerable residents is an appropriate use of state funds.*
- *It is prudent to restrict the eligible use of any state funds that may become available through the proposed manufactured housing program to serving those in greatest need of safe and adequate housing and that might not otherwise be penalized by certain shortcomings of manufactured housing as a dwelling type.*
- *The focus of a Florida manufactured housing assistance program should be low-income elderly and the disabled, with an additional eligibility category for very low income families (i.e., below 50% of the AMI)*
- *Funding for a state manufactured housing assistance program should be sought from appropriate funding sources where there is a rational nexus between the fee, tax or charge and manufactured housing.*
- *In designing such a program, the state should be mindful of the strengths and weaknesses of the manufactured housing industry, concerned about the continuation of strong consumer protection for Florida residents, and sensitive to the differential reliance on manufactured housing among Florida's communities.*
- *The state should be mindful of, and give due consideration to, the fact that some existing housing assistance programs have no barriers for the use of program funds for manufactured housing homebuyer or homeowner assistance.*
- *The state should continue to provide relocation assistance when residents of manufactured housing communities are adversely affected by park closures.*
- *The state should support and explore alternatives to park closure.*
- *Florida has strong manufactured housing consumer protection measures already in place. It should continue that strong record and consider the development of consumer education materials to inform potential buyers and assist them in making choices that capitalize on the strengths of manufactured housing and avoid the weaknesses.*

RECOMMENDATIONS

MAJOR RECOMMENDATION:

Create a state manufactured housing assistance program (MHAP) to assist local governments in meeting the needs of very low-income households (households at or below 50% of the AMI), and the housing needs of low-income elderly and the disabled. More specifically, the Florida Housing Finance Corporation and the Florida Department of Community Affairs, working with appropriate public and private organizations, should design a manufactured housing assistance program, draft legislative language to create the program under Chapter 420, Florida Statutes, and include the proposed legislation in their 2004 legislative package.

Supporting Recommendation 1:

Manufactured Housing Assistance Plan.

Implementation of the state manufactured housing program at the local level should be guided by a manufactured housing assistance plan (MHAP). The MHAP could include the following as eligible activities:

- Down payment assistance, closing costs, impact fees, assessment assistance
- Housing counseling (e.g. home maintenance, foreclosure prevention, consumer education and protection)
- Mobile home park preservation
- Rehabilitation and life-safety improvements
- Replacement of aging dilapidated units
- Special needs, e.g. meeting accessibility needs
- Utility hookups, potable water provision (well) and septic systems
- Installation costs

Supporting Recommendation 2: Guiding Principles.

The design of a state manufactured housing program should be consistent with the following guiding principles:

- Local agencies should be given flexibility for meeting local consumer needs. It should be structured similar to the State Housing Initiatives Partnership (SHIP) program.
- The state program should give overall guidance in regards to general goals to be met by the local program.
- The state MHAP should require a locally adopted implementation plan – the Manufactured Housing Assistance Plan.
- The state program guidelines should provide minimum criteria for local program consumer protection and consumer education.

Supporting Recommendation 3: Tier Funding.

The manufactured housing assistance program should be administered in two tiers. The first tier should be for entitlement jurisdictions and the second tier for non-entitlement jurisdictions. A total of 50 percent of the funds should be made available to entitlements by right, with the percentage of funds distributed according to the absolute number of manufactured housing in the jurisdiction. The remaining funds should be made available to non-entitlement jurisdictions, including small cities and counties, on a competitive basis.

The criteria for the second tier competitive scoring should consider the following factors:

- Percentage of manufactured housing units as percentage of overall housing stock
- Housing affordability in the community, e.g. median house price/median income
- Age of units
- Percentage of population less than 50 percent AMI, or less than 80 percent AMI for disabled or elderly
- Community millage rate status (i.e., at or near millage rate cap)
- Presence of an area of critical economic concern



**Supporting Recommendation 4:
Manufactured Housing Program
Administration.**

The state manufactured housing assistance program should be administered by the Florida Housing Finance Corporation.

**Supporting Recommendation 5:
Department of Revenue and Documentary
Stamp Taxes.**

The Department of Revenue should modify its record-keeping methods in order to ascertain what percentage of documentary stamp tax revenues are derived from manufactured housing real property transactions.

**Supporting Recommendation 6:
Funding Source.**

The state and/or the appropriate agency should create a dedicated funding source for a statewide Manufactured Housing Assistance Program. The following should be considered as possible revenue sources for the manufactured housing assistance program funding:

- Manufactured housing installation fees
- Title transfer fees (for manufactured housing)
- Manufactured housing tags
- Consider the use of CAT funds for manufactured housing for safety-related issues.

**Supporting Recommendation 7:
Program and resource availability.**

The state and appropriate agencies should promote the availability of funds for manufactured housing from existing programs that could otherwise be used for manufactured housing. This should be promoted/marketed to associations, agencies, jurisdictions and others.

**Supporting Recommendations 8:
Manufactured Relocation Fund.**

Support the funding of the Manufactured Housing Relocation Fund (cite statutory reference).

**Supporting Recommendation 9:
Park Preservation and Resident
Ownership.**

Consider the use of 501(c)(3) bonds or central function bonds by manufactured housing communities for purchase to become resident-owned communities. Develop model for Resident-Owned Community (ROC) as a land trust or cooperative in order to access preservation funding. Consider the inclusion of 'safe harbor' guidelines.

**Supporting Recommendation 10:
Consumer Education.**

Develop and disseminate comprehensive manufactured housing consumer protection and consumer education curriculum and educational materials.

CHAPTER 6

Agenda for the 2003 – 2004 Study Year

2003 – 2004 STUDY TOPIC

Housing the extremely low-income (Greater than 30% AMI) with a special emphasis on farmworker housing and housing in the urban core.

At the June 2003 meetings, the Commission conducted discussions on topics for the 2003–2004 study year. This list included, but was not limited, to such topics as:

- What are the effects of government regulation, especially growth management laws, on the cost of housing?
- How can we reduce the cost of housing through technology and reducing construction costs, reducing unnecessary regulations, etc.?
- The Sadowski Act After Ten Years –What has been the overall impact of the Act and have conditions improved for affordable housing?
- The role of affordable housing in addressing urban and rural blight and urban infill.
- Continuum of Care for Elders and housing the elderly
- Affordable housing private market lending – Opportunities, innovations and challenges
- Rehabilitation of rental housing

After discussion, including a joint recommendation from the Secretary of the Department of Community Affairs and the Executive Director of the Florida Housing Finance Corporation, the Commission chose to study housing the extremely low-income (>30% AMI) with a special emphasis on farmworker housing and housing in the urban core.

Related issues and study direction

- How do we serve the extremely low-income (ELI) currently?
- How is this presently handled in regards to rental and homeownership?
- In recognition that some of the ELI subpopulations are *disabled*⁴⁴, how and in what manner are supportive services “married” to housing?
- What are the economic or financial models for providing housing to this stratum and what do those models look like for both rental and homeownership? What are the necessary subsidies needed to make these work for the ELI?
- What about homeownership? What role does or should homeownership play in meeting the needs of this income stratum?
- What are the operating subsidies needed, especially in the case of housing with supportive services?
- What is the full range of farmworker housing providers?
- What exactly is 30% of the AMI? How does this translate into dollars? How does this vary across the state? How many people and households are included? What is the profile?
- How could ad valorem tax relief benefit ELI? Are there any legislative strategies that might provide incentives for providers through ad valorem tax relief?
- To what extent is there discrimination based on source of income for individuals or households?

- Are there relevant compliance questions regarding whether or not the ELI is actually being served under existing circumstances?
- Homeless – how many are there and what numbers can reasonably be expected to be able to mainstream?
- What should the Commission use as working definitions for farmworker and for urban core?
- What is the extent of need for technical assistance for non-profits that provide farmworker housing?
- How serious is the issue of asset divestiture for the elderly and the ELI?
- What is the role of housing authorities in addressing the needs of the ELI?
- Income levels and tax credits – exactly what income levels are served by tax credit deals?
- What are the federal policies and restrictions on access to housing assistance by ex-offenders and what flexibility do local housing providers have (housing authorities) with these policies?
- What are the obstacles to homeownership in rental requirements and what could be done to remove these obstacles?
- Homeownership for the ELI – How can homeownership be maintained for the ELI?
- Are there any examples from SHIP for homeownership for the ELI?
- How does the preservation of existing affordable housing units affect housing for the ELI?

⁴⁴ We are using the term disabled in the broad sense of the ADA which would mean that disabled includes not just the physically-disabled but others with a disabling conditions (e.g., mental illness, substance abuse, etc.).

APPENDIX ONE

Proposed Elements of a Manufactured Housing Buyer Consumer Education Program

Almost at the outset of its 2002-2003 study year, the Commission focused on and developed suggestions and guidelines for consumer education materials on manufactured housing. Given the diversity in the state and the growth of manufactured housing among minority populations, the Commission believes that all consumer education materials should be multi-lingual and available in audio and prepared at the 6th to 8th grade level.

The following outlines the recommendations for proposed elements of a comprehensive manufactured housing consumer education program. Some or all of these elements should be considered for any materials or curriculum developed by the state for local use following Recommendation 9 in the Commission Report.

Element 1: Manufactured Housing Basics

- Shopping for a unit
- About manufactured housing
- Financing terms
- Why manufactured housing? Pros and cons of manufactured housing
- Advantages
- Disadvantages

Element 2: Manufactured Housing in Florida

- The role of the Department of Highway Safety and Motor Vehicles
- The legal framework
- Consumer protection under Florida Law
- Styles of living - From trailer parks to manufactured housing

Element 3: How Affordable is Manufactured Housing?

Element 4: The Players: Who Does What?

- | | |
|-----------------------------|--------------------|
| The Government | Appraiser |
| Manufacturer | Transporter |
| HUD | Installer |
| Dealer | Developer |
| Site preparation contractor | Real estate broker |
| Lender | |
| Mortgage brokers | |

Element 5: Manufactured Home Marketing In Florida

- Styles of retailers
- Retailer economics
- Selecting a dealer

Element 6: Smart Shopping for Manufactured Housing

Element 7: Personal Property Loan Underwriting

- What's a personal property loan?
- The Four "C's": Credit, Capacity, Collateral, Capital
- Personal property loan closing costs
- Points

Element 8: Government-assisted MH financing programs

- FHA
- VA (Department of Veterans Affairs)
- Rural Housing Service
- Mortgage credit certificates (MCC)
- Other government sources in Florida for financing

Element 9: Evaluating MH Quality—New Homes

- Indicators of low quality
- Indicators of average quality
- Indicators of high quality

Element 10: Purchasing a Site for a manufactured housing unit**Element 11: Evaluating an Existing Home**

- Windows
- Foundation
- Septic system
- Floors
- Ceiling
- Roof
- Siding
- Things to avoid
- Financing

Element 12: Negotiating a Fair Home Price**Element 13: Making and Closing the Deal**

- Purchase and sale contract
- Loan closing
- Taking delivery

Element 14: Installation**Element 15: Insurance for sale (home included too)**

- Prepaid property insurance
- Homebuyer protection plan
- Credit life insurance
- Credit unemployment/disability insurance
- Homeowners insurance

Element 16: Planning for value appreciation

- Good location
- Blending in
- Quality
- Buying land for manufactured housing
- House-like foundation
- Mortgage financing

Element 17: Evaluating a manufactured home park

- The basics - mobile home parks in Florida
- Management
- Legal position
- Evaluating the tradeoffs: leased vs. owned land
- Renting land from family
- Financial impact of renting land
- Protections for mobile home park residents
- What to do when faced with conversions

Element 18: Consumer Rights and Responsibilities

- Consumer responsibilities
- Consumer rights

Element 19: Fair Housing

- The basics
- Fair housing and manufactured home parks

Element 20: Manufactured Home Maintenance

APPENDIX TWO

Resource Guide to Manufactured Housing

The following are some of the important resources on manufactured housing for those interested in learning more about manufactured housing, current status, major policy issues, state-of-the-art research and emerging issues and trends.

WEB RESOURCES

These are the leading web-based resource sites for manufactured housing. Many other sites, such as the American Association for Retired People (AARP) or the Consumer Union, also have important information for manufactured housing consumers.

- **www.manufacturedhousing.org**
Manufactured Housing Institute; the national organization of the manufactured housing industry
- **www.hsh.com/mhiinfo.html**
Manufactured Housing Resource Center
- **www.hud.gov/offices/hsg/sfh/mhs/mhshome.cfm**
The main page for the HUD manufactured housing program. This has a wealth of materials, reports and discussions on manufactured housing.
- **www.fmha.org/**
The website for the Florida Manufactured Housing Association, the principal trade group for the manufactured housing industry in Florida; state counterpart to the national Manufactured Housing Institute.
- **www.automatedbuildersconsortium.org**
The website for the Automated Builder's Consortium, a national organization that promotes automated building construction for purposes of job training, affordable housing and community development in the inner city and depressed rural areas.
- **www.research-alliance.org/pages/home.htm**
The website of the Manufactured Housing Research Alliance, an industry-based group that conducts research and development on manufactured housing. Wealth of technical

information, e.g., the Second Edition Manual on the Energy Star program design, installation and certification, is available for downloading on this site.

- **www.pathnet.org/**
PATH, Partnership for Advancing Technology in Housing, is a public-private initiative that seeks to speed the creation and widespread use of advanced technologies to radically improve the quality, durability, energy efficiency, environmental performance, and affordability of America's housing. PATH has a broad range of practical materials on manufactured housing, including a PATH Roadmap for manufactured housing and the manufactured housing industry.

PUBLISHED ARTICLES, REPORTS, AND GUIDES

These are published materials on various topics dealing with manufactured housing. Most are available electronically on the Affordable Housing Study Commission web site or links are provided to obtain electronic copies.

A Community Guide to Factory-Built Housing, Prepared for: U.S. Department of Housing and Urban Development, Office of Policy Development and Research, Steven Winters and Associates, September 2001.

A Feasibility Study of Mobile Home Recycling, Manufactured Housing Institute, October 2000.

Appreciation in Manufactured Housing: A Fresh Look at the Debate and the Data, by Kevin Jewel, Consumer Union Southwest Regional Office, February 2002.

Chronology of Florida State Legislation 1979 through 2001, Federation of Manufactured Home Owners of Florida, 2002.

Factory and Site Built Housing: Comparison for the 21st Century, NAHB Research Center, Inc., Upper Marlboro, MD, October 1998.

Future of Manufactured Housing, Vermeer and Louie, Joint Center for Housing Studies of Harvard University, 1997.

Home Builders' Guide To Manufactured Housing, PATH, Prepared by: NAHB Research Center, Inc., Upper Marlboro, MD; prepared for: U.S. Department of Housing and Urban Development, Office of Policy Development and Research, Washington, D.C. May 2000.

Homeowners and Tenants Too. By Rosenbloom, Philip. Shelterforce. July-August 2000.

How the Manufactured Housing Sector Built Itself Into a Mess. *Wall Street Journal*, May 24, 2001.

HUD Code Housing, (Manufactured Housing), Building Innovations for Homeownership, Chapter 2, PATH, 1998. Washington, D.C.

Impact of Manufactured Housing on Residential Property Values: A GIS-Based Approach. Lincoln Institute of Land Policy 2001.

Insecurity of Basic Tenant Rights in MH Parks—CU Report 2001

Manufactured Housing in Non-Metropolitan Areas: A Data Review, Housing Assistance Council, 1996.

Manufactured Housing as a Community- and Asset-Building Strategy: A Report to the Ford Foundation (Fall 2002), By William Appgar, Joint Center for Housing Studies; Allegra Calder, Joint Center for Housing Studies; Michael Collins, Neighborhood Reinvestment Corporation; Mark Duda, Joint Center for Housing Studies. Neighborhood Reinvestment Corporation in collaboration with the Joint Center for Housing Studies of Harvard University.

Mortgage Lending for Manufactured Homes: Maine State Housing Authority's Experiment, by Richard Genz, Housing & Community Insight; Neighborhood Reinvestment Corporation, September 2002.

Manufactured Housing Finance. Federal Reserve Bank of Atlanta, 2002 (not available electronically)

Manufactured Housing in North Carolina: Issues and Opportunities—Weill, NC Low Income Housing Coalition 2002.

Manufactured Housing...Dream or Nightmare? *Consumer Reports* 1998

Manufacturing Affordability? Michael Collins, Neighborworks Campaign for Homeownership, 2001.

The Many Benefits of Home Ownership, by Michael Collins, Neighborhood Reinvestment Corporation, 2002.

Not A Trailer Anymore: Perceptions of Manufactured Housing, by J.O. Beamish, R.C. Goss, J.H. Atiles, and Y. Kim, *Housing Policy Debate*, Volume 12, Issue 2, 2001.

Policy Guide on Factory Built Housing, American Planning Association, 1999.

State of the Nation's Housing 2002, Joint Center for Housing Studies of Harvard University.

State and Federal Preemption in the Mobile Home Arena: What Can Local Governments Truly Regulate, by Sanford A. Minkoff and Melanie N. Marsh, *Florida Bar Journal*, February, 2003.

Why Advocates Need to Rethink Manufactured Housing, by Richard Genz, *Housing Policy Debate*, Volume 12, Issue 2, 2001.

Will Manufactured Housing Become Home of First Choice? Don Bradley, Freddie Mac 1997.

APPENDIX THREE

Assumptions for the Manufactured Housing Affordability Index

The following are the assumptions underlying the affordability index discussed in Chapter 2. The index and the assumptions are provided by the Pappas Report, 2002.

Assumptions for the Manufactured Housing Affordability Index

1. Median family income is used rather than median household income, since family income reflects the resources of those most likely to purchase a new, single-family home, as opposed to those more likely to rent (households include non-related persons and persons living alone).
2. The price of a manufactured home includes cost of delivery and setup.
3. The cost of land for housing is identical whether the home placed on it is site-built or manufactured. As such, the median price of new, manufactured homes in subdivisions or on private land has been inflated to include a cost for land similar to that for site-built homes. This is estimated to be 20 percent of the cost of site-built housing through 1997 and 23.5 percent from 1998 on, according to the National Association of Home Builders (NAHB); statistics that are generally used by most home builder associations nationwide. In addition, the use of an identical land value allows for more direct comparison between housing types.
5. The mortgage rate is a composite figure for new, standard fixed- and adjustable-rate 30-year loans and is identical for both site-built homes and manufactured homes w/land included. In the case of manufactured homes being purchased without land (and destined to be located in land-rental communities), the interest rate is based on the home purchase as personal (rather than real) property for 15 years and is generally 3.5 points greater than for real property.
6. Mortgages for site-built and manufactured homes assume a standard 20 percent down payment. The loan for manufactured homes purchased without land assumes a standard 30 percent down payment.
7. The median monthly community rent figure for manufactured home rental communities is based on 1990 Census data, modified for other years by the Consumer Price Index and confirmed by survey. Data combines rental fees for single- and multi-section homes.
8. The monthly mortgage payment for new, site-built and manufactured homes on private land or in subdivisions is based on the current Fannie Mae requirement that a family may spend no more than 25 percent of its monthly income on housing payments (excluding taxes and insurance). This figure has been carried over to homes in rental communities.
9. The data sources for the index are the United States Census Bureau, Department of Housing and Urban Development, the Federal Housing Finance Board, and the U.S. bureau of Labor Statistics.

From: The Pappas Manufactured Housing and RV Report, 2002.

APPENDIX FOUR

Summary Tables on Manufactured Housing in Florida

Number of Units by Type

| County | Total Units | Single Family Unit | Multi-Family Unit | 2 Units | 3 or 4 Units | 5 to 9 Units | 10 to 19 Units | 20 to 49 Units | 50+ Units | Total MH | Other | %MH |
|--------------|-------------|--------------------|-------------------|---------|--------------|--------------|----------------|----------------|-----------|----------|-------|-------|
| Alachua | 95,113 | 49,500 | 34,558 | 2,892 | 6,858 | 9,321 | 7,211 | 3,636 | 4,640 | 10,973 | 82 | 11.54 |
| Baker | 7,592 | 3,875 | 235 | 107 | 54 | 22 | 30 | 13 | 9 | 3,438 | 44 | 45.28 |
| Bay | 78,435 | 45,732 | 19,549 | 2,544 | 4,219 | 3,723 | 2,221 | 1,476 | 5,366 | 12,926 | 228 | 16.48 |
| Bradford | 9,605 | 5,792 | 494 | 73 | 93 | 107 | 46 | 128 | 47 | 3,294 | 25 | 34.29 |
| Brevard | 222,072 | 146,810 | 49,971 | 3,690 | 7,978 | 10,771 | 9,364 | 8,263 | 9,905 | 24,092 | 1,199 | 10.85 |
| Broward | 741,043 | 360,764 | 352,349 | 20,225 | 33,347 | 41,120 | 53,717 | 89,061 | 114,879 | 26,834 | 1,096 | 3.62 |
| Calhoun | 5,250 | 3,041 | 179 | 52 | 71 | 34 | 6 | 10 | 6 | 2,012 | 18 | 38.32 |
| Charlotte | 79,758 | 55,122 | 12,496 | 1,383 | 1,995 | 2,967 | 2,161 | 2,003 | 1,987 | 11,611 | 529 | 14.56 |
| Citrus | 62,204 | 41,314 | 3,542 | 873 | 811 | 957 | 558 | 217 | 126 | 17,212 | 136 | 27.67 |
| Clay | 53,748 | 37,998 | 6,394 | 372 | 1,782 | 1,999 | 1,100 | 477 | 664 | 9,231 | 125 | 17.17 |
| Collier | 144,536 | 65,362 | 67,282 | 3,992 | 9,533 | 14,402 | 13,016 | 12,102 | 14,237 | 10,772 | 1,120 | 7.45 |
| Columbia | 23,579 | 12,278 | 1,851 | 630 | 400 | 289 | 92 | 259 | 181 | 9,273 | 177 | 39.33 |
| DeSoto | 13,608 | 6,350 | 1,311 | 495 | 282 | 406 | 64 | 32 | 32 | 5,049 | 898 | 37.10 |
| Dixie | 7,362 | 3,053 | 111 | 39 | 45 | 9 | 3 | 10 | 5 | 3,981 | 217 | 54.07 |
| Duval | 329,778 | 215,737 | 91,304 | 9,154 | 17,610 | 19,702 | 16,662 | 8,062 | 20,114 | 22,485 | 252 | 6.82 |
| Escambia | 124,647 | 87,133 | 25,401 | 4,446 | 5,158 | 5,013 | 3,325 | 2,166 | 5,293 | 11,935 | 178 | 9.58 |
| Flagler | 24,452 | 19,697 | 2,368 | 445 | 764 | 211 | 316 | 159 | 473 | 2,341 | 46 | 9.57 |
| Franklin | 7,180 | 5,017 | 610 | 121 | 55 | 243 | 27 | 76 | 88 | 1,451 | 102 | 20.21 |
| Gadsden | 17,703 | 10,650 | 1,050 | 266 | 330 | 250 | 43 | 22 | 139 | 5,964 | 39 | 33.69 |
| Gilchrist | 5,906 | 2,402 | 104 | 26 | 30 | 30 | 8 | 6 | 4 | 3,367 | 33 | 57.01 |
| Glades | 5,790 | 2,111 | 247 | 121 | 80 | 46 | 0 | 0 | 0 | 3,180 | 252 | 54.92 |
| Gulf | 7,587 | 4,901 | 645 | 144 | 186 | 179 | 91 | 43 | 2 | 1,929 | 112 | 25.43 |
| Hamilton | 4,966 | 2,433 | 268 | 86 | 76 | 64 | 10 | 26 | 6 | 2,225 | 40 | 44.80 |
| Hardee | 9,820 | 5,748 | 571 | 242 | 92 | 107 | 66 | 22 | 42 | 2,928 | 573 | 29.82 |
| Hendry | 12,294 | 5,851 | 1,005 | 476 | 219 | 120 | 116 | 51 | 23 | 5,316 | 122 | 43.24 |
| Hernando | 62,727 | 46,328 | 2,669 | 697 | 584 | 546 | 297 | 209 | 336 | 13,404 | 326 | 21.37 |
| Highlands | 48,846 | 29,253 | 5,456 | 1,619 | 1,179 | 766 | 776 | 575 | 541 | 13,491 | 646 | 27.62 |
| Hillsborough | 425,962 | 260,157 | 122,837 | 11,978 | 18,587 | 25,036 | 28,766 | 14,850 | 23,620 | 42,063 | 905 | 9.87 |
| Holmes | 7,998 | 5,002 | 275 | 97 | 75 | 52 | 31 | 6 | 14 | 2,711 | 10 | 33.90 |
| Indian River | 57,902 | 36,240 | 14,792 | 1,251 | 1,811 | 2,698 | 5,105 | 2,155 | 1,772 | 6,786 | 84 | 11.72 |
| Jackson | 19,490 | 11,909 | 1,260 | 516 | 222 | 210 | 67 | 175 | 70 | 6,265 | 56 | 32.14 |

| County | Total Units | Single Family Unit | Multi-Family Unit | 2 Units | 3 or 4 Units | 5 to 9 Units | 10 to 19 Units | 20 to 49 Units | 50+ Units | Total MH | Other | %MH |
|------------------|-------------|--------------------|-------------------|---------|--------------|--------------|----------------|----------------|-----------|----------|--------|-------|
| Jefferson | 5,251 | 3,209 | 161 | 29 | 28 | 40 | 18 | 46 | 0 | 1,867 | 14 | 35.56 |
| Lafayette | 2,660 | 1,429 | 75 | 15 | 44 | 3 | 3 | 4 | 6 | 1,072 | 84 | 40.30 |
| Lake | 102,830 | 61,494 | 10,107 | 2,222 | 2,380 | 1,869 | 1,107 | 1,257 | 1,272 | 30,549 | 680 | 29.71 |
| Lee | 245,405 | 134,511 | 70,952 | 9,802 | 10,688 | 14,138 | 13,441 | 12,506 | 10,377 | 38,084 | 1,858 | 15.52 |
| Leon | 103,974 | 60,462 | 32,144 | 4,209 | 7,276 | 5,757 | 4,879 | 3,739 | 6,284 | 11,274 | 94 | 10.84 |
| Levy | 16,570 | 7,309 | 629 | 218 | 180 | 143 | 5 | 72 | 11 | 8,530 | 102 | 51.48 |
| Liberty | 3,156 | 1,576 | 28 | 11 | 5 | 5 | 7 | 0 | 0 | 1,469 | 83 | 46.55 |
| Madison | 7,836 | 4,290 | 479 | 73 | 148 | 159 | 34 | 47 | 18 | 2,954 | 113 | 37.70 |
| Manatee | 138,128 | 72,151 | 37,117 | 7,467 | 5,112 | 6,865 | 6,042 | 5,943 | 5,688 | 27,891 | 969 | 20.19 |
| Marion | 122,663 | 75,857 | 11,542 | 1,886 | 3,519 | 2,700 | 1,580 | 788 | 1,069 | 34,455 | 809 | 28.09 |
| Martin | 65,471 | 38,666 | 19,039 | 1,925 | 3,394 | 4,167 | 6,143 | 2,550 | 860 | 7,626 | 140 | 11.65 |
| Miami-Dade | 852,278 | 448,569 | 387,550 | 21,913 | 33,382 | 43,328 | 54,749 | 73,590 | 160,588 | 15,338 | 821 | 1.80 |
| Monroe | 51,617 | 28,415 | 12,609 | 2,531 | 2,770 | 2,154 | 1,727 | 1,594 | 1,833 | 9,814 | 779 | 19.01 |
| Nassau | 25,917 | 14,857 | 4,262 | 813 | 905 | 685 | 447 | 596 | 816 | 6,771 | 27 | 26.13 |
| Okaloosa | 78,593 | 52,798 | 19,328 | 2,030 | 3,745 | 3,222 | 1,897 | 2,524 | 5,910 | 6,385 | 82 | 8.12 |
| Okeechobee | 15,504 | 6,826 | 836 | 306 | 256 | 186 | 69 | 11 | 8 | 7,630 | 212 | 49.21 |
| Orange | 361,349 | 227,164 | 113,760 | 8,181 | 19,698 | 26,318 | 27,384 | 14,348 | 17,831 | 20,068 | 357 | 5.55 |
| Osceola | 72,293 | 46,340 | 14,477 | 1,424 | 3,513 | 4,100 | 2,684 | 1,386 | 1,370 | 10,989 | 487 | 15.20 |
| Palm Beach | 556,428 | 307,104 | 228,687 | 17,288 | 40,115 | 36,069 | 34,299 | 51,082 | 49,834 | 20,083 | 554 | 3.61 |
| Pasco | 173,717 | 109,251 | 18,561 | 3,101 | 4,103 | 4,447 | 2,754 | 1,389 | 2,767 | 43,700 | 2,205 | 25.16 |
| Pinellas | 481,573 | 261,008 | 169,202 | 14,258 | 21,922 | 27,158 | 29,912 | 28,859 | 47,093 | 50,264 | 1,099 | 10.44 |
| Polk | 226,376 | 126,660 | 31,447 | 7,714 | 7,278 | 5,834 | 3,200 | 1,953 | 5,468 | 65,235 | 3,034 | 28.82 |
| Putnam | 33,870 | 16,704 | 2,048 | 444 | 614 | 317 | 59 | 199 | 415 | 14,935 | 183 | 44.10 |
| Santa Rosa | 49,119 | 35,967 | 4,510 | 823 | 1,633 | 826 | 255 | 372 | 601 | 8,586 | 56 | 17.48 |
| Sarasota | 182,467 | 116,036 | 46,025 | 5,132 | 4,974 | 7,285 | 7,681 | 9,758 | 11,195 | 20,226 | 180 | 11.08 |
| Seminole | 147,079 | 104,366 | 37,467 | 2,688 | 6,417 | 9,698 | 9,612 | 4,296 | 4,756 | 5,066 | 180 | 3.44 |
| St. Johns | 58,008 | 37,962 | 12,074 | 1,313 | 2,408 | 2,374 | 2,192 | 1,444 | 2,343 | 7,688 | 284 | 13.25 |
| St. Lucie | 91,262 | 60,843 | 18,547 | 3,188 | 3,583 | 2,851 | 2,544 | 1,532 | 4,849 | 11,595 | 277 | 12.71 |
| Sumter | 25,195 | 14,683 | 639 | 192 | 130 | 170 | 34 | 104 | 9 | 9,495 | 378 | 37.69 |
| Suwannee | 15,679 | 7,461 | 685 | 266 | 89 | 60 | 23 | 61 | 186 | 7,460 | 73 | 47.58 |
| Taylor | 9,646 | 5,342 | 438 | 114 | 107 | 140 | 46 | 15 | 16 | 3,517 | 349 | 36.46 |
| Union | 3,736 | 1,787 | 204 | 93 | 76 | 17 | 5 | 4 | 9 | 1,743 | 2 | 46.65 |
| Volusia | 211,938 | 140,866 | 45,891 | 4,792 | 7,604 | 7,518 | 5,146 | 5,799 | 15,032 | 24,272 | 909 | 11.45 |
| Wakulla | 9,820 | 5,423 | 191 | 77 | 51 | 36 | 20 | 7 | 0 | 4,178 | 28 | 42.55 |
| Walton | 29,083 | 15,459 | 6,956 | 558 | 898 | 1,213 | 886 | 1,053 | 2,348 | 6,417 | 251 | 22.06 |
| Washington | 9,503 | 5,579 | 297 | 179 | 60 | 29 | 18 | 11 | 0 | 3,539 | 88 | 37.24 |
| State of Florida | 7,302,947 | 4,245,984 | 2,180,148 | 196,327 | 313,631 | 363,281 | 366,197 | 375,229 | 565,483 | 849,304 | 27,511 | 11.63 |

APPENDIX FOUR

Summary Tables on Manufactured Housing in Florida

When Built

| County | Total MH | Before 1980 | | | 1980 - 1994 | | | 1995+ |
|--------------|----------|-------------|--------|-------|-------------|--------|-------|-------|
| | | Total | Own | Rent | Total | Own | Rent | Total |
| Alachua | 10,973 | 2,688 | 1,785 | 903 | 4,662 | 3,661 | 1,001 | 2,255 |
| Baker | 3,438 | 926 | 604 | 322 | 1,485 | 1,166 | 319 | 714 |
| Bay | 12,926 | 2,962 | 1,789 | 1,173 | 4,612 | 3,530 | 1,082 | 2,568 |
| Bradford | 3,294 | 937 | 721 | 216 | 1,204 | 926 | 278 | 714 |
| Brevard | 24,092 | 7,564 | 6,102 | 1,462 | 9,771 | 8,920 | 851 | 1,155 |
| Broward | 26,834 | 12,735 | 10,983 | 1,752 | 5,846 | 5,189 | 657 | 901 |
| Calhoun | 2,012 | 455 | 294 | 161 | 742 | 570 | 172 | 486 |
| Charlotte | 11,611 | 3,636 | 3,247 | 389 | 3,295 | 3,103 | 192 | 544 |
| Citrus | 17,212 | 4,904 | 3,791 | 1,113 | 6,501 | 5,585 | 916 | 1,676 |
| Clay | 9,231 | 2,281 | 1,501 | 780 | 4,217 | 3,472 | 745 | 1,943 |
| Collier | 10,772 | 3,611 | 2,795 | 816 | 3,473 | 2,807 | 666 | 601 |
| Columbia | 9,273 | 1,877 | 1,226 | 651 | 3,905 | 3,091 | 814 | 2,319 |
| DeSoto | 5,049 | 1,591 | 1,035 | 556 | 1,872 | 1,435 | 437 | 372 |
| Dixie | 3,981 | 965 | 732 | 233 | 1,190 | 1,029 | 161 | 634 |
| Duval | 22,485 | 6,601 | 3,834 | 2,767 | 9,216 | 6,515 | 2,701 | 3,790 |
| Escambia | 11,935 | 3,656 | 1,785 | 1,871 | 4,584 | 2,809 | 1,775 | 2,028 |
| Flagler | 2,341 | 492 | 376 | 116 | 1,125 | 930 | 195 | 324 |
| Franklin | 1,451 | 394 | 314 | 80 | 561 | 483 | 78 | 201 |
| Gadsden | 5,964 | 1,191 | 744 | 447 | 2,495 | 2,050 | 445 | 1,584 |
| Gilchrist | 3,367 | 734 | 601 | 133 | 1,376 | 1,174 | 202 | 718 |
| Glades | 3,180 | 714 | 576 | 138 | 951 | 753 | 198 | 387 |
| Gulf | 1,929 | 410 | 293 | 117 | 548 | 472 | 76 | 228 |
| Hamilton | 2,225 | 377 | 281 | 96 | 988 | 720 | 268 | 523 |
| Hardee | 2,928 | 853 | 521 | 332 | 1,150 | 941 | 209 | 269 |
| Hendry | 5,316 | 1,413 | 898 | 515 | 2,383 | 1,995 | 388 | 805 |
| Hernando | 13,404 | 3,887 | 3,220 | 667 | 5,634 | 4,894 | 740 | 1,159 |
| Highlands | 13,491 | 3,075 | 2,566 | 509 | 4,537 | 4,112 | 425 | 487 |
| Hillsborough | 42,063 | 13,600 | 8,755 | 4,845 | 17,010 | 12,539 | 4,471 | 4,468 |
| Holmes | 2,711 | 627 | 389 | 238 | 1,098 | 929 | 169 | 574 |
| Indian River | 6,786 | 2,060 | 1,768 | 292 | 2,579 | 2,290 | 289 | 362 |
| Jackson | 6,265 | 1,319 | 960 | 359 | 2,553 | 2,022 | 531 | 1,298 |
| Jefferson | 1,867 | 429 | 255 | 174 | 795 | 678 | 117 | 473 |
| Lafayette | 1,072 | 349 | 245 | 104 | 325 | 241 | 84 | 188 |

| County | Total MH | Before 1980 | | | 1980 - 1994 | | | 1995+ |
|-------------------------|----------------|----------------|----------------|---------------|----------------|----------------|---------------|---------------|
| | | Total | Own | Rent | Total | Own | Rent | Total |
| Lake | 30,549 | 9,089 | 7,590 | 1,499 | 12,271 | 11,161 | 1,110 | 2,138 |
| Lee | 38,084 | 11,080 | 9,386 | 1,694 | 12,179 | 11,121 | 1,058 | 1,675 |
| Leon | 11,274 | 2,485 | 1,431 | 1,054 | 4,543 | 3,218 | 1,325 | 2,603 |
| Levy | 8,530 | 1,952 | 1,634 | 318 | 3,407 | 2,874 | 533 | 1,670 |
| Liberty | 1,469 | 327 | 204 | 123 | 465 | 379 | 86 | 190 |
| Madison | 2,954 | 626 | 437 | 189 | 1,267 | 1,097 | 170 | 527 |
| Manatee | 27,891 | 10,914 | 9,775 | 1,139 | 6,023 | 5,735 | 288 | 950 |
| Marion | 34,455 | 9,117 | 6,863 | 2,254 | 13,315 | 11,175 | 2,140 | 5,032 |
| Martin | 7,626 | 3,755 | 2,999 | 756 | 2,273 | 2,053 | 220 | 182 |
| Miami-Dade | 15,338 | 7,129 | 5,015 | 2,114 | 5,189 | 3,943 | 1,246 | 1,160 |
| Monroe | 9,814 | 4,111 | 2,897 | 1,214 | 1,990 | 1,405 | 585 | 312 |
| Nassau | 6,771 | 1,600 | 1,094 | 506 | 3,316 | 2,716 | 600 | 1,257 |
| Okaloosa | 6,385 | 2,132 | 1,056 | 1,076 | 2,217 | 1,448 | 769 | 1,228 |
| Okeechobee | 7,630 | 1,926 | 1,242 | 684 | 3,176 | 2,388 | 788 | 557 |
| Orange | 20,068 | 6,871 | 4,854 | 2,017 | 9,384 | 7,628 | 1,756 | 1,813 |
| Osceola | 10,989 | 3,031 | 2,318 | 713 | 4,716 | 4,010 | 706 | 1,040 |
| Palm Beach | 20,083 | 9,590 | 8,162 | 1,428 | 5,082 | 4,122 | 960 | 1,207 |
| Pasco | 43,700 | 13,756 | 10,591 | 3,165 | 14,316 | 12,387 | 1,929 | 3,614 |
| Pinellas | 50,264 | 25,271 | 22,215 | 3,056 | 9,177 | 8,033 | 1,144 | 890 |
| Polk | 65,235 | 13,860 | 9,841 | 4,019 | 24,353 | 20,749 | 3,604 | 7,521 |
| Putnam | 14,935 | 4,157 | 3,178 | 979 | 5,574 | 4,760 | 814 | 2,127 |
| Santa Rosa | 8,586 | 1,965 | 1,200 | 765 | 3,410 | 2,509 | 901 | 1,510 |
| Sarasota | 20,226 | 3,362 | 2,965 | 397 | 4,601 | 4,355 | 246 | 549 |
| Seminole | 5,066 | 2,319 | 1,410 | 909 | 3,323 | 2,502 | 821 | 1,740 |
| St. Johns | 7,688 | 8,652 | 7,818 | 834 | 4,813 | 4,547 | 266 | 443 |
| St. Lucie | 11,595 | 2,117 | 1,575 | 542 | 2,083 | 1,844 | 239 | 379 |
| Sumter | 9,495 | 2,416 | 1,783 | 633 | 4,004 | 3,522 | 482 | 996 |
| Suwannee | 7,460 | 1,434 | 1,015 | 419 | 3,245 | 2,874 | 371 | 1,819 |
| Taylor | 3,517 | 583 | 429 | 154 | 1,252 | 1,010 | 242 | 626 |
| Union | 1,743 | 336 | 174 | 162 | 823 | 641 | 182 | 393 |
| Volusia | 24,272 | 9,549 | 7,868 | 1,681 | 8,723 | 7,992 | 731 | 1,542 |
| Wakulla | 4,178 | 959 | 606 | 353 | 2,004 | 1,656 | 348 | 712 |
| Walton | 6,417 | 1,367 | 996 | 371 | 2,027 | 1,575 | 452 | 1,434 |
| Washington | 3,539 | 618 | 398 | 220 | 1,246 | 956 | 290 | 898 |
| State of Florida | 849,304 | 267,769 | 206,005 | 61,764 | 298,470 | 244,227 | 49,054 | 87,482 |

APPENDIX FOUR

Summary Tables on Manufactured Housing in Florida

Population

| County | Total MH | Own | Rent | Totals by Tenure | | Owner Pop in OwnMH | Persons/ MH Unit | Rental Pop In MH Unit | Persons/ Mh Unit |
|--------------|----------|-------|------|------------------|------------|-----------------------|---------------------|--------------------------|---------------------|
| | | | | Total Own | Total Rent | | | | |
| Alachua | 10,973 | 1,916 | 339 | 7,362 | 2,243 | 18,857 | 2.6 | 5,092 | 2.3 |
| Baker | 3,438 | 697 | 17 | 2,467 | 658 | 7471 | 3.0 | 1,994 | 3.0 |
| Bay | 12,926 | 2,262 | 306 | 7,581 | 2,561 | 20,420 | 2.7 | 5,833 | 2.3 |
| Bradford | 3,294 | 662 | 52 | 2,309 | 546 | 6294 | 2.7 | 1,580 | 2.9 |
| Brevard | 24,092 | 1,101 | 54 | 16,123 | 2,367 | 30,317 | 1.9 | 5,226 | 2.2 |
| Broward | 26,834 | 773 | 128 | 16,945 | 2,537 | 35,621 | 2.1 | 5,246 | 2.1 |
| Calhoun | 2,012 | 475 | 11 | 1,339 | 344 | 3615 | 2.7 | 750 | 2.2 |
| Charlotte | 11,611 | 527 | 17 | 6,877 | 598 | 11,843 | 1.7 | 1,164 | 1.9 |
| Citrus | 17,212 | 1,578 | 98 | 10,954 | 2,127 | 24,023 | 2.2 | 4,691 | 2.2 |
| Clay | 9,231 | 1,807 | 136 | 6,780 | 1,661 | 19,680 | 2.9 | 3,917 | 2.4 |
| Collier | 10,772 | 505 | 96 | 6,107 | 1,578 | 14,289 | 2.3 | 4,921 | 3.1 |
| Columbia | 9,273 | 2,088 | 231 | 6,405 | 1,696 | 17,702 | 2.8 | 4,299 | 2.5 |
| DeSoto | 5,049 | 344 | 28 | 2,814 | 1,021 | 6,496 | 2.3 | 3,670 | 3.6 |
| Dixie | 3,981 | 622 | 12 | 2,383 | 406 | 5,966 | 2.5 | 895 | 2.2 |
| Duval | 22,485 | 3,380 | 410 | 13,729 | 5,878 | 36,006 | 2.6 | 14,558 | 2.5 |
| Escambia | 11,935 | 1,625 | 403 | 6,219 | 4,049 | 15,668 | 2.5 | 9,904 | 2.4 |
| Flagler | 2,341 | 304 | 20 | 1,610 | 331 | 3,646 | 2.3 | 760 | 2.3 |
| Franklin | 1,451 | 182 | 19 | 979 | 177 | 2,569 | 2.6 | 426 | 2.4 |
| Gadsden | 5,964 | 1,489 | 95 | 4,283 | 987 | 12,611 | 2.9 | 3,094 | 3.1 |
| Gilchrist | 3,367 | 641 | 77 | 2,416 | 412 | 6,471 | 2.7 | 860 | 2.1 |
| Glades | 3,180 | 348 | 39 | 1,677 | 375 | 4,247 | 2.5 | 869 | 2.3 |
| Glades | 3,180 | 348 | 39 | 1,677 | 375 | 4,247 | 2.5 | 869 | 2.3 |
| Gulf | 1,929 | 198 | 30 | 963 | 223 | 2,464 | 2.6 | 505 | 2.3 |
| Hamilton | 2,225 | 504 | 19 | 1,505 | 383 | 4,200 | 2.8 | 1,010 | 2.6 |
| Hardee | 2,928 | 231 | 38 | 1,693 | 579 | 4,713 | 2.8 | 2,353 | 4.1 |
| Hendry | 5,316 | 685 | 120 | 3,578 | 1,023 | 11,734 | 3.3 | 3,432 | 3.4 |
| Hernando | 13,404 | 1,102 | 57 | 9,216 | 1,464 | 19,206 | 2.1 | 3,945 | 2.7 |
| Highlands | 13,491 | 440 | 47 | 7,118 | 981 | 13,845 | 1.9 | 2,574 | 2.6 |
| Hillsborough | 42,063 | 3,825 | 643 | 25,119 | 9,959 | 62,220 | 2.5 | 26,536 | 2.7 |
| Holmes | 2,711 | 527 | 47 | 1,845 | 454 | 4,703 | 2.5 | 1,098 | 2.4 |
| Indian River | 6,786 | 308 | 54 | 4,366 | 635 | 8,346 | 1.9 | 1,603 | 2.5 |
| Jackson | 6,265 | 1,208 | 90 | 4,190 | 980 | 10,676 | 2.5 | 2,163 | 2.2 |
| Jefferson | 1,867 | 431 | 42 | 1,364 | 333 | 3,514 | 2.6 | 1,112 | 3.3 |

| County | Total MH | Own | Rent | Totals by Tenure | | Owner Pop in OwnMH | Persons/ MH Unit | Rental Pop In MH Unit | Persons/ Mh Unit |
|-------------------------|----------------|---------------|--------------|------------------|----------------|-----------------------|---------------------|--------------------------|---------------------|
| | | | | Total Own | Total Rent | | | | |
| Lafayette | 1,072 | 168 | 20 | 654 | 208 | 1,689 | 2.6 | 613 | 2.9 |
| Lake | 30,549 | 2,017 | 121 | 20,768 | 2,730 | 41,321 | 2.0 | 6,456 | 2.4 |
| Lee | 38,084 | 1,528 | 147 | 22,035 | 2,899 | 39,994 | 1.8 | 7,559 | 2.6 |
| Leon | 11,274 | 2,235 | 368 | 6,884 | 2,747 | 19,016 | 2.8 | 5,683 | 2.1 |
| Levy | 8,530 | 1,548 | 122 | 6,056 | 973 | 14,564 | 2.4 | 2,335 | 2.4 |
| Liberty | 1,469 | 182 | 8 | 765 | 217 | 1,972 | 2.6 | 639 | 2.9 |
| Madison | 2,954 | 493 | 34 | 2,027 | 393 | 5,661 | 2.8 | 915 | 2.3 |
| Manatee | 27,891 | 901 | 49 | 16,411 | 1,476 | 26,947 | 1.6 | 2,761 | 1.9 |
| Marion | 34,455 | 4,569 | 463 | 22,607 | 4,857 | 53,458 | 2.4 | 11,672 | 2.4 |
| Martin | 7,626 | 172 | 10 | 5,224 | 986 | 9,436 | 1.8 | 2,256 | 2.3 |
| Miami-Dade | 15,338 | 776 | 384 | 9,734 | 3,744 | 27,817 | 2.9 | 11,767 | 3.1 |
| Monroe | 9,814 | 166 | 146 | 4,468 | 1,945 | 9,293 | 2.1 | 4,332 | 2.2 |
| Nassau | 6,771 | 1,183 | 74 | 4,993 | 1,180 | 13,835 | 2.8 | 3,081 | 2.6 |
| Okaloosa | 6,385 | 1,083 | 145 | 3,587 | 1,990 | 9,448 | 2.6 | 4,796 | 2.4 |
| Okeechobee | 7,630 | 511 | 46 | 4,141 | 1,518 | 10,021 | 2.4 | 4,149 | 2.7 |
| Orange | 20,068 | 1,615 | 198 | 14,097 | 3,971 | 31,719 | 2.3 | 10,448 | 2.6 |
| Osceola | 10,989 | 868 | 172 | 7,196 | 1,591 | 16,782 | 2.3 | 3,981 | 2.5 |
| Palm Beach | 20,083 | 966 | 241 | 13,250 | 2,629 | 28,335 | 2.1 | 7,205 | 2.7 |
| Pasco | 43,700 | 3,333 | 281 | 26,311 | 5,375 | 55,253 | 2.1 | 13,135 | 2.4 |
| Pinellas | 50,264 | 809 | 81 | 31,057 | 4,281 | 50,763 | 1.6 | 7,496 | 1.8 |
| Polk | 65,235 | 6,980 | 541 | 37,570 | 8,164 | 84,139 | 2.2 | 22,719 | 2.8 |
| Putnam | 14,935 | 1,926 | 201 | 9,864 | 1,994 | 23,974 | 2.4 | 5,651 | 2.8 |
| Santa Rosa | 8,586 | 1,339 | 171 | 5,048 | 1,837 | 12,728 | 2.5 | 5,212 | 2.8 |
| Sarasota | 20,226 | 467 | 82 | 7,787 | 725 | 13,186 | 1.7 | 1,646 | 2.3 |
| Seminole | 5,066 | 1,533 | 207 | 5,445 | 1,937 | 14,309 | 2.6 | 4,736 | 2.4 |
| St. Johns | 7,688 | 408 | 35 | 12,773 | 1,135 | 20,980 | 1.6 | 2,112 | 1.9 |
| St. Lucie | 11,595 | 311 | 68 | 3,730 | 849 | 7,340 | 2.0 | 1,951 | 2.3 |
| Sumter | 9,495 | 934 | 62 | 6,239 | 1,177 | 14,092 | 2.3 | 3,165 | 2.7 |
| Suwannee | 7,460 | 1,670 | 149 | 5,559 | 939 | 14,312 | 2.6 | 2,486 | 2.6 |
| Taylor | 3,517 | 588 | 38 | 2,027 | 434 | 5,295 | 2.6 | 1,053 | 2.4 |
| Union | 1,743 | 349 | 44 | 1,164 | 388 | 3,362 | 2.9 | 950 | 2.4 |
| Volusia | 24,272 | 1,446 | 96 | 17,306 | 2,508 | 32,241 | 1.9 | 5,342 | 2.1 |
| Wakulla | 4,178 | 653 | 59 | 2,915 | 760 | 7,516 | 2.6 | 1,891 | 2.5 |
| Walton | 6,417 | 1,195 | 239 | 3,766 | 1,062 | 9,640 | 2.6 | 2,445 | 2.3 |
| Washington | 3,539 | 825 | 73 | 2,179 | 583 | 5,739 | 2.6 | 1,608 | 2.8 |
| State of Florida | 849,304 | 78,532 | 8,950 | 533,953 | 119,768 | 1,185,610 | | 300,326 | |



Myths of Manufactured Housing

MYTH: Manufactured homes are fire traps. A small fire in one section will ignite the entire home.

FACT: Modern manufactured housing has long out-lived any susceptibility it might have had. Today, manufactured housing is as safe as site-built housing. Manufactured home fires and deaths have declined by more than half since 1980, comparable to the decline in other dwelling unit types. According to the National Fire Protection Association, manufactured homes had the same fire death rate as other dwellings.¹

MYTH: Manufactured homes don't have to meet building or safety standards. Buyers take a calculated risk when purchasing manufactured homes.

FACT: Manufactured homes today meet stringent federal building and safety standards and are inspected throughout the manufacturing process. Federal building and safety standards have been in place since 1976 and are updated periodically.

MYTH: Manufactured homes are not energy efficient.

FACT: The energy efficiency of modern manufactured housing greatly surpasses trailer-era units. In Florida, many manufacturers offer units with the coveted Energy Star rating, i.e., the federal energy efficiency rating. This is given to homes that are at least 30 percent more energy efficient than a comparable home built to the Council of American Building Officials 1993 Model Energy Code.

MYTH: Manufactured homes have to be placed well up off the ground, usually on concrete blocks. This makes them unsightly and susceptible to being blown off their block foundation.

FACT: Manufactured homes are installed in a variety of fashions. In Florida installation regulations have been in force for almost ten years and the state is one of the nation's leaders in the installation process standards.

MYTH: Mobile home parks attract lower income people who don't work and collect welfare.

FACT: The residents of manufactured housing have lower incomes than their site-built home counterparts; but there is no evidence to suggest that a greater proportion receive governmental assistance. Recent research indicates that almost 50 percent of all manufactured units have at least one person over the age of 55 – many of whom are retired persons on fixed-incomes.

MYTH: Manufactured homes don't last as long as site built homes.

FACT: Research undertaken at the National Laboratories of the National Association of Home Builders revealed that both site-built and manufactured housing are both capable of providing adequate housing for over 50 years.²

MYTH: No one would live in a manufactured home if they didn't have to.

FACT: People make housing decisions based on a variety of factors. For many people today, manufactured housing is the housing of choice regardless of income. In many less-populated counties of the state, the vast majority of new housing starts are manufactured housing.

MYTH: Most manufactured housing is rental housing.

FACT: The vast majority of manufactured housing units are owner-occupied. Ownership rates for manufactured housing equals or exceeds ownership rates of other dwelling types combined.

¹ National Fire Protection Association, 1999.

² It is noted, however, that a large factor in the longevity of any dwelling unit is the maintenance and upkeep the unit receives over time.



**THE AFFORDABLE HOUSING
STUDY COMMISSION
FINAL REPORT 2003**

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